



IT IS ORDERED as set forth below:

Date: January 31, 2024

Paul Baisier

Paul Baisier
U.S. Bankruptcy Court Judge

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re:

Front Runner Productions, Inc., et al

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 24-50790-pmb

Jointly Administered

**ORDER (I) SCHEDULING HEARING ON
VERIFIED PETITION UNDER CHAPTER 15
OF THE BANKRUPTCY CODE FOR RECOGNITION
OF A FOREIGN MAIN PROCEEDING AND FOR ADDITIONAL
RELIEF AND ASSISTANCE UNDER 11 U.S.C. §§105(a), 1507, AND 1521 AND
(II) SPECIFYING FORM AND MANNER OF SERVICE OF NOTICE OF HEARING**

UPON CONSIDERATION of the motion (the "Motion")¹ of the Foreign Representative for the Debtors for entry of an order scheduling a hearing on the Foreign Representative's verified petition for recognition of a foreign main proceeding and the relief

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Motion.

requested therein and specifying the form and manner of service of notice of the hearing; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and notice of the Motion having been given as provided in the Motion, and such notice having been adequate and appropriate under the circumstances; and it appearing that no other or further notice of the Motion need be provided; and the Court having held a hearing to consider the relief requested in the Motion (the “Hearing”); and upon the record of the Hearing and all of the proceedings had before the Court; and the Court having found and determined that the relief sought in the Motion and granted herein is in the best interests of the Debtors, their respective estates and creditors, and all parties in interest, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby **ORDERED** that:

1. The form of the Notice attached hereto as **Exhibit 1** is hereby **APPROVED**.
2. Copies of the Notice, the Chapter 15 Pleadings, including the Petitions for Recognition, related filings, and the documents filed in support thereof (collectively, the “Service Documents”) shall be served by United States mail, first-class postage pre-paid and electronic mail (where available) on or before the third business day after the entry of this order upon the Core Notice Parties and the Notice Parties, as set forth in the Motion, at their last known addresses.
3. If any party files a notice of appearance in this case, the Foreign Representative shall serve the Service Documents upon such party within five (5) business days of the filing of such notice of appearance if such documents have not already been served on such party (or its counsel).
4. Service of the Service Documents in accordance with this Order is hereby approved

as adequate and sufficient notice and service of the Service Documents on all interested parties.

5. A virtual hearing (the “Hearing”) on the relief sought in the Petitions for Recognition as well as responses or objections, if any, to the Service Documents shall be held on **February 27, 2024 at 1:30 P.M. (Eastern Standard Time), via Judge Baisier’s Virtual Hearing Room.**¹

6. Responses or objections, if any, to the Petitions for Recognition or the Service Documents must be in writing describing the basis therefor and shall be (i) filed with the Clerk of the Bankruptcy Court, 75 Ted Turner Drive, SW, Room 1340, Atlanta, GA 30303, United States of America; and (ii) served upon JONES & WALDEN LLC, 699 Piedmont Ave NE Atlanta, GA 30308, United States of America (Cameron McCord, cmccord@joneswalden.com; and Mark Gensburg, mgensburg@joneswalden.com), United States counsel to the Foreign Representative, on or before **February 23, 2024 at 5:00 P.M. (Eastern Standard Time).**

7. The Hearing may be adjourned from time to time without notice other than an announcement in open court at the Hearing or the adjourned date of the hearing.

8. Notwithstanding Section 1514(c) of the Bankruptcy Code, the Foreign Representative is not at this time setting a deadline for the filing of claims in these Chapter 15 cases but reserves the right to do so at a later date.

¹ The link for the Virtual Hearing Room can be found on Judge Baisier’s webpage at <https://www.ganb.uscourts.gov/content/honorable-paul-m-baisier> and is best used on a desktop or laptop computer but may be used on a phone or tablet. Participants’ devices must have a camera and audio.

9. Service pursuant to this Order shall be good and sufficient service and adequate notice of the hearing to consider the Petitions for Recognition and the Foreign Representative's request for an order granting recognition of the foreign proceeding as a "foreign main proceeding" and for related relief.

[END OF ORDER]

Prepared and Presented by:

JONES & WALDEN LLC

/s/ Cameron M. McCord

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EXHIBIT 1

Notice

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re:

Front Runner Productions, Inc., *et al.*,

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 24-50790-pmb

Jointly Administered

**NOTICE OF FILING AND HEARING ON VERIFIED
PETITION OF FOREIGN MAIN PROCEEDING AND RELATED RELIEF**

PLEASE TAKE NOTICE that on January 24 & 25, 2024, BRON Media Corp., in its capacity as the Canadian Court-appointed and authorized foreign representative (the “Foreign Representative”) for the above-captioned debtors (collectively, the “Debtors”) in a reorganization proceeding (the “CCAA Proceeding”) commenced under Canada’s Companies’ Creditors Arrangement Act (the “CCAA”) pending before the Supreme Court of British Columbia (Court File No. S-235084) in British Columbia, Canada, by the Foreign Representative’s undersigned United States counsel, filed an *Official Form Petition* for each of the Debtors, the *Omnibus Petition for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representative, (III) Recognition of Second Amended and Restated Initial Order, and (IV) Related Relief Under Chapter 15 of the Bankruptcy Code*, and the *Omnibus Motion of Foreign Representative, for an Order Granting Certain Provisional Relief* (together with all exhibits, declarations and other documents appended thereto or filed in connection therewith, the “Petitions for Recognition”) commencing Chapter 15 cases ancillary to the CCAA Proceeding and seeking (i) recognition of such foreign proceeding as “foreign main proceeding” and (ii) relief in aid of the CCAA Proceeding in the United States Bankruptcy Court for the Northern District of Georgia (the “Bankruptcy Court”) with respect to the Debtors, including certain additional relief pursuant to Sections 105, 362, 363, 365, 1507, and 1521 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that, pursuant to the *Order Scheduling Hearing on Verified Chapter 15 Petition and Specifying Form and Manner of Notice of Hearing* [Docket No. _] (the “Scheduling Order”), the Bankruptcy Court has scheduled a hearing on **February 27, 2024 at 1:30 P.M. (Eastern Standard Time) via Judge Baisier’s Virtual Hearing Room²** (the “Hearing”).

PLEASE TAKE FURTHER NOTICE that any response or objection to the relief requested in the Petitions for Recognition must be (i) in writing describing the basis therefor; (ii) filed with the Clerk of the Bankruptcy Court, 75 Ted Turner Drive, SW, Room 1340, Atlanta, GA 30303, United States of America, **on or before February 20, 2024 at 5:00 P.M. (Eastern Standard Time)** (the “Objection Deadline”); and (iii) served upon JONES & WALDEN LLC,

² The link for the Virtual Hearing Room can be found on Judge Baisier’s webpage at <https://www.ganb.uscourts.gov/content/honorable-paul-m-baisier> and is best used on a desktop or laptop computer but may be used on a phone or tablet. Participants’ devices must have a camera and audio.

699 Piedmont Ave NE Atlanta, GA 30308, United States of America (Cameron McCord, cmccord@joneswalden.com; and Mark Gensburg, mgensburg@joneswalden.com), United States counsel to the Foreign Representative, on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that all parties in interest opposed to the Petitions for Recognition or the Foreign Representative's request for relief must appear at the Hearing at the time and place set forth above. Further, the Hearing may be adjourned from time to time without further notice other than an announcement in open court at the Hearing of the adjourned date or dates or any further adjourned hearing.

PLEASE TAKE FURTHER NOTICE that the Foreign Representative intends to raise issues pertaining to foreign law, specifically Canadian insolvency law including the CCAA, in connection with the Petitions for Recognition: (i) recognizing the CCAA Proceeding as a foreign main proceeding pursuant to Chapter 15 of the Bankruptcy Code and the Foreign Representative as the Debtors' foreign representative under Bankruptcy Code Sections 1509 and 1517; (ii) granting automatic relief pursuant to Bankruptcy Code section 1520; and (iii) granting other and additional relief pursuant to Bankruptcy Code sections 1507 and 1521(a) and (b).

PLEASE TAKE FURTHER NOTICE that if no response or objection is timely filed and served as provided above, the Bankruptcy Court may grant the recognition and relief requested by the Foreign Representative without further notice. Copies of the Petitions for Recognition and the Scheduling Order may be obtained by contacting the undersigned United States counsel to the Foreign Representative.

Dated: January [], 2024.

JONES & WALDEN LLC

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Representative*