

**EXHIBIT C**

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

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In re:

VIDANGEL, INC.,

Debtor.

**Case No. 17-29073**

Chapter 11

Judge Kevin R. Anderson

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**DECLARATION OF LEV E. BREYDO IN SUPPORT OF MOVANTS' MOTION FOR  
DISMISSAL OF THE DEBTOR'S CHAPTER 11 PETITION PURSUANT TO 11 U.S.C.  
1112(b), OR IN THE ALTERNATIVE, FOR RELIEF FROM THE AUTOMATIC STAY  
PURSUANT TO 11 U.S.C. §362(d)**

DECLARATION OF LEV E. BREYDO

I, Lev E. Breydo, hereby declare:

1. I am admitted to practice in the State of New York. My admission to practice *pro hac vice* before this Court is currently pending. I am an attorney at the law firm of Munger, Tolles & Olson LLP, counsel for the Movants in the above-captioned matter. I have personal knowledge of the facts set forth in this declaration.<sup>1</sup> If called as a witness, I could and would testify competently to the matters set forth herein.

2. On October 20, 2017, this Court conducted a first day hearing with respect to the Debtor, VidAngel, Inc. An audio recording of that hearing is available on this Court's ECF site for Case No. 2017-29073, at Docket No. 19. I have listened to the recording of the October 20 first day hearing. At the hearing, in response to the court's questions regarding the California Action, VidAngel's counsel stated that the company plans to file a motion to transfer the California Action and consolidate it with VidAngel's actions in the Utah District Court.

3. On October 31, 2017, VidAngel's CEO, Neal Harmon, participated in an hour-long podcast interview with Doug Wells, of KCPW. The podcast is available at <http://kcpw.org/blog/local-programs/the-bottom-line/2017-10-31/vidangel-not-just-company-movement/>. I have listened to a recording of Mr. Harmon's interview with Mr. Wells. During the interview, Mr. Harmon publicly disclosed highly-confidential, commercially-sensitive information regarding one of the Movants that VidAngel's counsel had learned during a deposition in the California Action. The information had been designated "attorneys' eyes only" under the Protective Order entered in that case. During that same interview, Mr. Harmon also

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<sup>1</sup> "Movants" are Disney Enterprises, Inc., Lucasfilm Ltd. LLC, Twentieth Century Fox Film Corporation, Warner Bros. Entertainment Inc., Marvel Characters, Inc., New Line Productions, Inc. and Turner Entertainment Co.

stated that VidAngel is a “very healthy company” and that VidAngel could exit Chapter 11 “very quickly if we could just see whether we have damages [and] get them liquidated.” Mr. Harmon further expressed that “the damages would be determined by the California court, because that’s where the lawsuit is.”

I declare under penalty of perjury under the laws of the United States of America that the  
foregoing is true and correct.

Executed on November 7, 2017 at Los Angeles, California.



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Lev E. Breydo