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Attorneys for Movants

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

In re:

VIDANGEL, INC.,

Debtor.

Case No. 17-29073

Chapter 11

Honorable Kevin R. Anderson

**NOTICE 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), AND
NOTICE OF HEARING ON MOTION**

Objection Deadline: Monday, November 27, 2017

Hearing Date and Time: Tuesday, December 5, 2017, at 10:00 a.m.

PLEASE TAKE NOTICE THAT, on November 8, 2017, Disney Enterprises, Inc., Lucasfilm Ltd. LLC, Twentieth Century Fox Film Corporation, Warner Bros. Entertainment Inc., MVL Film Finance LLC, New Line Productions, Inc. and Turner Entertainment Co. (collectively, the “Movants”) filed their *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), and Memorandum in Support* (the “Motion”) [Dkt. 69] with the United States Bankruptcy Court for the District of Utah (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE THAT, in the Motion, the Movants have asked the Bankruptcy Court for entry of an Order dismissing the above-entitled bankruptcy case, for cause, pursuant to 11 U.S.C. § 1112(b). The Movants also have asked the Bankruptcy Court, in the alternative, for entry of an Order lifting the automatic stay, for cause pursuant to 11 U.S.C. § 362(d), concerning certain litigation that is now pending between the Movants and the Debtor in the United States District Court for the Central District of California, entitled *Disney Enterprises, Inc. et al. v. VidAngel, Inc.*, Case No. 2:16-cv-04109-AB-PLA, and allowing that litigation to proceed to the entry of a final judgment.

PLEASE TAKE FURTHER NOTICE THAT the Motion, together with all exhibits attached thereto, is on file with the Clerk of the United States Bankruptcy Court for the District of Utah, United States Courthouse, 350 South Main, Room 301, Salt Lake City, Utah 84101, and may be reviewed at that address during regular business hours. Copies of the Motion also may be obtained by making a written request upon Michael R. Johnson, local bankruptcy counsel for the Movants, by: (a) mail to 36 South State Street, Suite 1400, Salt Lake City, Utah 84101; (b) email to either mjohnson@rqn.com or dburton@rqn.com; or (c) facsimile to (801) 532-7543.

PLEASE TAKE FURTHER NOTICE THAT a hearing on the Motion (the “**Hearing**”) has been scheduled before the Honorable Kevin R. Anderson, United States Bankruptcy Court Judge, for **Tuesday, December 5, 2017, at 10:00 a.m.**, or as soon thereafter as the matter may be heard, in Room 376 of the Frank E. Moss United States Courthouse, 350 South Main Street, Salt Lake City, Utah 84101. Failure to attend the Hearing may be deemed a waiver of your objection.

PLEASE TAKE FURTHER NOTICE THAT any interested party desiring to respond or object to the relief requested in the Motion must file their written response or objection with the above-captioned Court, and serve a copy of their response or objection upon the undersigned counsel, by no later than **Monday, November 27, 2017**.

PLEASE TAKE FURTHER NOTICE THAT if a timely response or objection to the Motion is not filed, the Court may grant the relief requested in the Motion without conducting the Hearing. Additionally, if a timely response or objection is not filed, the Movants will ask the Court to approve the Motion without further notice or hearing. Finally, upon resolution of any timely filed and served objections to the Motion, the Movants also will ask the Court to approve the Motion without further notice or hearing.

YOUR RIGHTS MAY AND LIKELY WILL BE AFFECTED BY THE MOTION, AS MORE PARTICULARLY SET FORTH ABOVE AND IN THE MOTION. YOU SHOULD READ THIS NOTICE AND THE MOTION CAREFULLY, AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THE ABOVE-ENTITLED BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE). IF YOU DO NOT OPPOSE OR OTHERWISE OBJECT TO THE

MOTION, YOU NEED NOT FILE A WRITTEN RESPONSE, AND YOU NEED NOT ATTEND THE HEARING.

If you do not want the Court to grant the relief requested in the Motion, or if you want the Court to consider your views concerning the Motion, then you or your attorney must do the following:

A. On or before **Monday, November 27, 2017**, you must file a written response with the Court explaining your position with respect to the Motion. You should file your written response or objection with the Clerk of the Bankruptcy Court, and serve a copy of your response or objection on counsel for the Movants; and

B. Attend the Hearing on the Motion, which has been scheduled for **Tuesday, December 5, at 10:00 a.m.** in Room 376 of the United States Courthouse, 350 South Main Street, Salt Lake City, Utah 84101, before the Honorable Kevin R. Anderson, United States Bankruptcy Court Judge.

If you mail your written response to the Court for filing, you must mail it early enough so that the Court will actually **receive it** on or before the date stated above. You must also mail to or otherwise serve a copy of your written response upon counsel for the Movants at (a) Todd J. Rosen, Kelly M. Klaus and Lev E. Breydo, Munger Tolles & Olson LLP, 350 South Grand Avenue, 50th Floor, Los Angeles, California 90071-3426, (b) Brent O. Hatch, Hatch, James & Dodge, P.C., 10 West Broadway, Suite 400, Salt Lake City, Utah 84101, and (c) Michael R. Johnson and David H. Leigh, Ray Quinney & Nebeker P.C., 36 South State Street, Suite 1400, Salt Lake City, Utah 84101.

DATED this 9th day of November, 2017.

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—and—

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Email: dleigh@rqn.com

/s/ Michael R. Johnson

Michael R. Johnson

Attorneys for the Movants

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of November, 2017, I electronically filed the foregoing Notice of 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), And Notice Of Hearing On Motion with the Clerk of Court using the CM/ECF system, which sent notification of such filing to the electronic filing users in this case as follows:

- **J. Thomas Beckett** tbeckett@parsonsbehle.com, ecf@parsonsbehle.com;brothschild@parsonsbehle.com;kstankevitz@parsonsbehle.com
- **Laurie A. Cayton tr** laurie.cayton@usdoj.gov, James.Gee@usdoj.gov;Lindsey.Huston@usdoj.gov;Suzanne.Verhaal@usdoj.gov
- **Grace S. Pusavat** gpusavat@parsonsbehle.com
- **Brian M. Rothschild** brothschild@parsonsbehle.com, ecf@parsonsbehle.com
- **United States Trustee** USTPRegion19.SK.ECF@usdoj.gov

/s/ Carrie Hurst _____