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**Hearing Date: April 10, 2018, 10:00 a.m.**

**Objection Deadline: March 23, 2018**

*Proposed Attorneys for VidAngel, Inc.*

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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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**NOTICE UNDER LOCAL RULE 9013-2 OF OPPORTUNITY  
FOR HEARING ON DEBTOR'S MOTION TO EMPLOY  
KAPLAN, VOEKLER, CUNNINGHAM & FRANK, PLC AS  
SPECIAL COUNSEL UNDER SECTIONS 327(e) AND 328(a)  
OF THE BANKRUPTCY CODE**

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**PLEASE TAKE NOTICE** VidAngel, Inc., the above-captioned debtor and debtor in possession (the “**Debtor**”) has filed with the United States Bankruptcy Court for the District of Utah (the “**Court**”) its Motion to Employ Kaplan, Voekler, Cunningham & Frank, PLC as Special Counsel under Sections 327(e) and 328(a) of the Bankruptcy Code (the “**Motion**”), and that the Court has reserved a hearing (the “**Hearing**”) before the Honorable Kevin R. Anderson on the Motion on April 10, 2018, at 10:00 a.m. (MT) in the above-referenced Court located at 350 South Main Street, Salt Lake City, UT 84101, Courtroom 376.

**YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this chapter 11 case. If you do not have an attorney, you may wish to consult one.**

**Relief Requested.** By the Motion, the Debtor requests entry of an order authorizing the Debtor to employ Kaplan, Voekler, Cunningham & Frank, PLC (“KVCF”) as special counsel to continue to provide advice to the Debtor on matters that may arise in connection with the Debtor’s plan for restructuring and reorganization.

**NO HEARING WILL BE CONDUCTED ON THE MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE COURT ON OR BEFORE THE OBJECTION DEADLINE SET FORTH BELOW.**

If you do not want the Court to grant the relief requested in the Motion, then you or your attorney must—

(1) on or before March 23, 2018 (the “**Objection Deadline**”) file with the Court electronically or at the address below a written Objection, explaining your position:

United States Bankruptcy Court  
350 South Main Street, Room 301  
Salt Lake City, UT 84101

If you mail your objection to the Court for filing you must mail it early enough so that the Court will receive it on or before the Objection Deadline. You must also mail a copy to the undersigned counsel at the following address:

Parsons Behle & Latimer  
Attn: Brian M. Rothschild  
201 S. Main St. Suite 1800  
Salt Lake City, UT 84111

(2) attend a hearing on April 10, 2018, at 10:00 a.m. (MT) at 350 South Main Street, Salt Lake City, UT 84101, Courtroom 376. There will be no further notice of the Hearing or Objection Deadline. Failure to attend the Hearing will be deemed a waiver of your objection.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting the requested relief. In the absence of a timely filed objection, the undersigned counsel may and will ask the Court to enter an order approving the Motion without holding the Hearing.

Dated this 6th day of March, 2018.

/s/ Brian M. Rothschild

Brian M. Rothschild

J. Thomas Beckett

**PARSONS BEHLE & LATIMER**

*Proposed Attorneys for VidAngel, Inc.*

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**PROOF OF SERVICE**

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I hereby certify that on March 6, 2018, I caused a true and correct copy of the foregoing **NOTICE UNDER LOCAL RULE 9013-2 OF OPPORTUNITY FOR HEARING ON DEBTOR'S MOTION TO EMPLOY KAPLAN, VOEKLER, CUNNINGHAM & FRANK, PLC AS SPECIAL COUNSEL UNDER SECTION 327(e) OF THE BANKRUPTCY CODE** and **DEBTOR'S MOTION TO EMPLOY KAPLAN, VOEKLER, CUNNINGHAM & FRANK, PLC AS SPECIAL COUNSEL UNDER SECTION 327(e) OF THE BANKRUPTCY CODE** and **DEBTOR'S MOTION TO EMPLOY KAPLAN, VOEKLER, CUNNINGHAM & FRANK, PLC AS SPECIAL COUNSEL UNDER SECTION 327(e) OF THE BANKRUPTCY CODE** to be filed with the ECF system, which electronically served the following:

- Lev E. Breydo lev.breydo@mto.com
- Laurie A. Cayton tr laurie.cayton@usdoj.gov, James.Gee@usdoj.gov; Lindsey.Huston@usdoj.gov; Suzanne.Verhaal@usdoj.gov
- Michael R. Johnson mjohanson@rqn.com, docket@rqn.com;dburton@rqn.com
- David H. Leigh dleigh@rqn.com, dburton@rqn.com;docket@rqn.com
- Todd J. Rosen todd.rosen@mto.com, rhonda.clarke@mto.com
- United States Trustee USTPRegion19.SK.ECF@usdoj.gov

On March 6, 2018, I served the following parties by dropping a copy of the foregoing pleadings by U.S. Mail, First Class, postage prepaid, as follows:

Kelly M. Klaus  
Munger, Tolles & Olson, LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071-3426

Todd Rosen  
Munger, Tolles & Olson, LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071-3426

Respectfully submitted,

/s/ Brian M. Rothschild

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Brian M. Rothschild

**PARSONS BEHLE & LATIMER**

*Attorneys for VidAngel, Inc.*