

J. Thomas Beckett, USB #5587
Brian M. Rothschild, USB #15316
Grace S. Pusavat, USB #15713
PARSONS BEHLE & LATIMER
201 South Main Street, Suite 1800
Salt Lake City, Utah 84111
Telephone: 801.532.1234
Facsimile: 801.536.6111
TBeckett@parsonsbehle.com
BRothschild@parsonsbehle.com
GPusavat@parsonsbehle.com
ecf@parsonsbehle.com

Attorneys for VidAngel, Inc.

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

In re:

VIDANGEL, INC.,

Debtor.

Case No. 17-bk-29073-KRA

Chapter 11

Judge Kevin R. Anderson

***EX PARTE* MOTION FOR EXPEDITED HEARING ON
DEBTOR'S SUPPLEMENTAL MOTION FOR ENTRY OF
ORDER (1) AUTHORIZING DEBTOR'S CONTINUING
USE OF CASH MANAGEMENT SYSTEMS, INCLUDING
CREDIT CARDS AND (2) GRANTING RELATED
RELIEF**

VidAngel, Inc., the above-captioned debtor and debtor-in-possession (the “**Debtor**” or “**VidAngel**”) hereby respectfully requests that the Court hold an expedited hearing on its Motion (the “**Motion**”) under Section 364(a) of Title 11 of the United States Code (the “**Bankruptcy Code**”) for entry of a final order (the “**Final Order**”) (1) authorizing but not directing the Debtor to use a portion of cash reserves as security/collateral against future charges on the Debtor’s credit cards, and (2) granting such further relief as is required to effectuate the foregoing. In support of this *Ex Parte* Motion, VidAngel respectfully states as follows:

I.
JURISDICTION

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).
2. Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The bases for the relief requested herein are sections 364(d) of title 11 of the United States Code (the “**Bankruptcy Code**”) and Rules 9006(c) and (d) of the Federal R. Bankr. P. (the “**Bankruptcy Rules**”).

II.
SUMMARY OF RELIEF REQUESTED

1. The Debtor requests that the Court shorten the notice period and hold a hearing on the Motion as soon as practicable.
2. The Debtor also requests that the Court set the deadline for objections to the Motion to the evening before the hearing (November 19, 2018) at 5:00 p.m.
3. In the Motion, the Debtor requests that the Court enter an order (1) authorizing but not directing the Debtor to use a portion of cash reserves as security/collateral against future charges on the Debtor’s credit cards, and (2) granting such further relief as is required to effectuate the foregoing. Further bases for granting the Motion and the authority supporting the relief are articulated in the Motion.
4. Bankruptcy Rules 9006(c)(1) and (d) allow the Court to reduce the time for a hearing and for responsive pleadings.
5. Bankruptcy Rule 9006(d) permits parties to submit an *ex parte* motion shorten time for a hearing for cause.

6. Cause exists because the Debtor's inability to use its credit cards to track expenses pending entry of the order is damaging to its business and its ability to track and control its expenses. A full notice period on a motion under Bankruptcy Rule 9006 would further harm the Debtor, its management, and their efforts to effectuate the Debtor's reorganization.

7. A proposed order granting this Ex Parte Motion and setting the hearing for November 20, 2018, at 2:00 p.m. will be uploaded contemporaneously herewith.

Dated this 6th day of November, 2018.

Respectfully submitted,

/s/ Brian M. Rothschild

J. Thomas Beckett

Brian M. Rothschild

Grace S. Pusavat

PARSONS BEHLE & LATIMER

Attorneys for VidAngel, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of November, 2018, I electronically filed the foregoing ***EX PARTE MOTION FOR EXPEDITED HEARING ON DEBTOR'S SUPPLEMENTAL MOTION FOR ENTRY OF ORDER (1) AUTHORIZING DEBTOR'S CONTINUING USE OF CASH MANAGEMENT SYSTEMS, INCLUDING CREDIT CARDS AND (2) GRANTING RELATED RELIEF*** as follows:

By filing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to all requesting such notice.

- Michael Ronald Brown mbrown@parsonsbehle.com
- Laurie A. Cayton tr laurie.cayton@usdoj.gov, James.Gee@usdoj.gov;Lindsey.Huston@usdoj.gov;Suzanne.Verhaal@usdoj.gov
- Rose Leda Ehler rose.ehler@mto.com, cynthia.soden@mto.com
- Michael R. Johnson mjohanson@rqn.com, docket@rqn.com;dburton@rqn.com
- Kelly M. Klaus kelly.klaus@mto.com
- David H. Leigh dleigh@rqn.com, dburton@rqn.com;docket@rqn.com
- United States Trustee USTPRegion19.SK.ECF@usdoj.gov

By U.S. Mail by sending a copy by U.S. Mail, First-Class, postage prepaid to the following:

Brent O. Hatch Johnson & Hatch 10 West Broadway Suite 400 Salt Lake City, UT 84101	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	

/s/ Brian M. Rothschild

Brian M. Rothschild