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*Attorneys for the Movants 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.*

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

In re:

VIDANGEL, INC.,

Debtor.

Case No. 17-29073

Chapter 11

Judge Kevin R. Anderson

**NOTICE OF EMERGENCY MOTION TO APPOINT A CHAPTER 11 TRUSTEE, AND
NOTICE OF HEARING ON MOTION**

Objection Deadline: Monday, July 1, 2019

Hearing Date and Time: Tuesday, July 23, 2019, at 10:00 a.m.

PLEASE TAKE NOTICE THAT, on June 14, 2019, 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 “**Studios**”) filed their *Emergency Motion to Appoint a Chapter 11 Trustee* (the “**Motion**”) with the United States Bankruptcy Court for the District of Utah (the “**Bankruptcy Court**”).

PLEASE TAKE FURTHER NOTICE THAT, in the Motion, the Studios have asked the Bankruptcy Court for entry of an Order appointing a Chapter 11 trustee in this case, pursuant to 11 U.S.C. §§ 1104(a)(1) and (a)(2), and for other related relief.

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 Studios, by: (a) mail to 36 South State Street, Suite 1400, Salt Lake City, Utah 84101; (b) email to 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, July 23, 2019, 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, or in such other courtroom as may be assigned. 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, July 1, 2019**.

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 Studios 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 Studios 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, July 1, 2019**, 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 Studios; and

B. Attend the Hearing on the Motion, which has been scheduled for **Tuesday, July 23, 2019, at 10:00 a.m.** in Room 376 of the United States Courthouse, 350 South Main Street, Salt Lake City, Utah 84101, or such other courtroom as may be assigned, 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 Studios at (a) Kelly M. Klaus, 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, Ray Quinney & Nebeker P.C., 36 South State Street, Suite 1400, Salt Lake City, Utah 84101.

DATED this 14th day of June 2019.

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—and—

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—and—

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/s/ Michael R. Johnson
Michael R. Johnson

Attorneys for the Movants

CERTIFICATE OF SERVICE

I hereby certify that on June 14, 2019, I electronically filed the foregoing 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
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- **Grace S. Pusavat** gpusavat@parsonsbehle.com
- **Brian M. Rothschild** brothschild@parsonsbehle.com, ecf@parsonsbehle.com
- **United States Trustee** USTPRegion19.SK.ECF@usdoj.gov

I further certify that on June 14, 2019, I caused to be mailed a true and correct copy of the foregoing to the following parties via first class mail:

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/s/ Dianne Burton