
**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 DEPOSITION/RULE 2004 EXAMINATION

**To: VidAngel, Inc.
c/o J. Thomas Beckett
PARSONS BEHLE & LATIMER
201 South Main Street, Suite 1800
Salt Lake City, Utah 84111**

NOTICE IS HEREBY GIVEN that 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**”), through counsel, intend to conduct a combined oral deposition and Rule 2004 examination of VidAngel, Inc. (“**VidAngel**” or the “**Debtor**”), by and through its designated representative(s) and most knowledgeable person(s), pursuant to Federal Rules of Bankruptcy Procedure 2004, 7030 and 7034 and Bankruptcy Local Rule 2004-1, on Tuesday, June 25, 2019, beginning at 2:00 p.m.

The deposition/examination will take place at the offices of **Ray Quinney & Nebeker P.C., 86 North University Avenue, Provo, Utah 84601**, and will continue from day to day until it is completed. The deposition/examination will be taken orally before a duly authorized court reporter authorized to administer oaths, will be recorded by stenographic means, and may be videotaped. The deposition/examination will cover the topics set forth in Schedule A hereto.

DATED this 21st day of June, 2019.

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/s/ Michael R. Johnson

Michael R. Johnson

Attorneys for the Studios

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 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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- **United States Trustee** USTPRegion19.SK.ECF@usdoj.gov

I further certify that on June 21, 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

SCHEDULE A

EXAMINATION TOPICS

1. The June 10, 2019 agreement (“**Agreement**”) between VidAngel and Skip Foundation, Inc. (“**Skip**”), any and all drafts of that Agreement, and any and all communications, negotiations or other discussions concerning the Agreement or relevant events leading up to the execution of the Agreement.
2. Any and all consideration or value to be received by VidAngel under the Agreement.
3. The nature, extent and value of VidAngel’s intellectual property (“**IP technology**”), including the IP technology that is the subject of the Agreement.
4. Any and all attempts to value VidAngel’s IP technology, including the IP technology that is the subject of the Agreement.
5. The creation of Skip, and the current or contemplated interest of VidAngel or any person or entity affiliated with VidAngel, in Skip.
6. The business reasons, purposes or justifications for the Agreement.
7. The business reasons, purposes or justifications of any other contemplated transfer of VidAngel’s assets, to Skip or any other party.
8. All facts regarding VidAngel’s decision to enter into the Agreement.
9. All facts and circumstances related to VidAngel’s *Motion for Order Authorizing Transfer of Intellectual Property* [Dkt. 308] and the factors to be considered by the Bankruptcy Court concerning that motion.
10. All facts and circumstances related to the Studios’ *Emergency Motion to Appoint a Chapter 11 Trustee* [Dkt. 310] and the factors to be considered by the Bankruptcy Court concerning that motion.

11. The status of VidAngel's reorganization plans, including but not limited to its pending *Debtor's Disclosure Statement for Its Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* [Dkt. 264] (the "**Proposed Plan**").

12. Whether VidAngel intends to proceed with the Proposed Plan and, if so, how approval of the Agreement would impact the Proposed Plan and VidAngel's reorganization efforts.

13. Whether VidAngel intends to amend the Proposed Plan and, if so, the substance of such amendments and how such amendments would impact VidAngel's reorganization efforts.

14. The \$62,448,750 jury verdict against VidAngel in Disney Enterprises, Inc. et al. v. VidAngel, Case No. 2:16-cv-04019-AB (Central District of California), and how that jury verdict or the outcome of that case may impact VidAngel's ability to reorganize.

15. The corporate structure of Skip, the current officers, directors, shareholders and employees of Ski, and Skip's assets, liabilities and financial affairs.

16. VidAngel's subsidiary VAS Portal, LLC ("**VAS**").

17. Any loans or other extensions of credit to VAS.

18. All facts addressed in VidAngel's SEC Form 1-K filing for the period ending 12/31/2019 as they relate to VAS, including but not limited to the transactions described therein between VidAngel and Harmon Ventures, LLC involving Skip.