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Attorneys for George Hofmann,
Chapter 11 Trustee

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

In re:

VIDANGEL, INC.,

Debtor.

Bankruptcy No. 17-29073 (KRA)

Chapter 11

SUPPLEMENTAL AFFIDAVIT OF GEORGE HOFMANN

STATE OF UTAH)
 : ss
COUNTY OF SALT LAKE)

I, George Hofmann, declare:

1. I am an attorney duly admitted to practice before all courts of the State of Utah, as well as this Court. I am also the duly appointed, qualified, and acting Chapter 11 Trustee of the above-captioned bankruptcy estate.

2. I am a member of the law firm of Cohne Kinghorn, P.C. ("CK"). I have filed a motion, which is pending, to employ CK as my general counsel in connection with this case.

3. In connection with my service as Chapter 11 Trustee in this case, I filed a Verified Statement [Docket No. 355], indicating that I had no connections with any

parties in interest in this case. This statement was based upon the results of a conflict check that was performed under my direction using the CK conflict check database.

4. After that conflict check was completed, and after I submitted the Verified Statement, it occurred to me that I do have an arguable connection with a party in interest—one that out of an abundance of caution should be disclosed.

5. At the time of my appointment as Chapter 11 Trustee, my personal 401(k) retirement account held a number of stocks, mutual funds, and other investments. I have some ability to direct the purchase and sale of these investments. One of the stocks held by my 401(k) account was the Walt Disney Company. My 401(k) account held approximately \$19,000 of Walt Disney Company stock (approximately 137 shares). The Disney stock was purchased more than two years ago. Today I requested the liquidation of this Disney stock and accordingly as of this afternoon (September 4, 2019) my 401(k) account no longer holds any stock in the Walt Disney Company.

6. I advised the Office of the United States Trustee of this connection yesterday, and was told by that office that if my 401(k) account immediately sold the shares and explained these circumstances, that they would conclude that my 401(k) plan's former ownership of Disney stock does not render me disinterested.

7. I do not believe that the above-described "connection" is an interest adverse to the estate or the debtor or that this connection renders me or CK not disinterested, and as such the employment me as Chapter 11 Trustee, and of CK pursuant to Bankruptcy Code § 327, remains appropriate in my opinion. I did not disclose this connection through the Verified Statement because the arguable connection did not occur to me until later, when I become more conversant with this

case and the role of Disney Enterprises, Inc. as a creditor in this case. It is also not the type of connection that would be captured by a search of my firm's electronic conflict database.

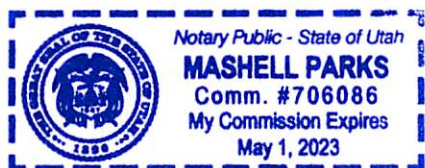
I declare under penalty of perjury that the foregoing is true and correct.

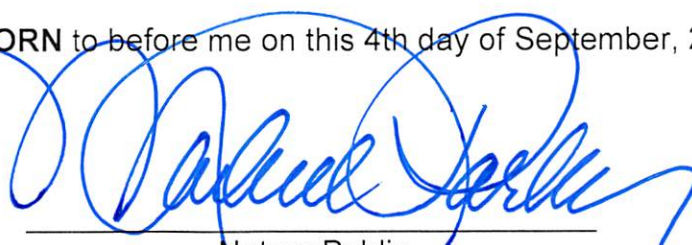
Executed this 4th day of September, 2019.



George Hofmann

SUBSCRIBED AND SWORN to before me on this 4th day of September, 2019.





Notary Public

My Commission Expires: *MAY 1, 2023*

CERTIFICATE OF SERVICE

I hereby certify that on September 4, 2019, I electronically filed the **SUPPLEMENTAL AFFIDAVIT OF GEORGE HOFMANN** with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system:

By Electronic Service: I certify that the parties of record in this case as identified below, are registered CM/ECF users, and will be served notice of entry of the foregoing Order through the CF/ECF System:

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/s/ George Hofmann