

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

VER TECHNOLOGIES HOLDCO, LLC, *et al.*,

Debtors,

Chapter 11

Case No. 18-10834

(Jointly Administered)

**RESPONSE AND LIMITED OBJECTION TO THE SECOND AMENDED  
JOINT CHAPTER 11 PLAN OF REORGANIZATION**

Pacotech, Inc. (“Pacotech”) by and through its undersigned counsel hereby submits this limited objection (the “Limited Objection”) to the Debtors’ Second Amended Joint Chapter 11 Plan of Reorganization of VER Technologies HoldCo LLC and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (the “Plan”) (document 572). Pacotech strongly supports the confirmation of the Plan and submits this Response and Limited Objection solely to clarify and confirm its understanding that the arrearages under its pre-petition lease of equipment to the Debtors (“Lease”) will be paid at the Effective Date. Pacotech specifically states as follows:

1. On or about April 5, 2018 (the “Petition Date”), the above-captioned Debtors (the “Debtors”) each filed petitions for relief under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”). The Debtors have continued in possession of their property and have continued to operate and manage their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. Pacotech has a prepetition ten year lease (“Lease”) with the Debtors dated October 1, 2014 for certain proprietary video equipment including but not limited to 3D Rigs for \$14,000.00 per month ending on October 1, 2024.

3. Pacotech and Debtors amended this Lease on January 31, 2018 (“Amendment”) which included an amended default provision which states in relevant part “For the avoidance of



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doubt, the \$2,000.00 fee shall continue to accrue bi-weekly until the Lessee brings all Monthly Rent payments current.” The Amendment did not change the payment amount or term of the underlying lease.

4. The Plan provides for the assumption of the Lease.

5. The Plan provides in Article V, Section B that the holders of executory contracts and unexpired leases must object if the Cure Cost set forth in the Plan for their respective executory contracts or leases is inaccurate or be deemed to have waived the right to object.

6. The Lease obligation of \$14,000/month has not been paid since filing. As a consequence, the amount outstanding (a/k/a the cure cost) is \$70,000 (hereinafter referred to as “Pace Cure Cost”).

7. The Notice of Filing of Plan Supplement Schedule C-2 (document 551), attached to the Plan, inadvertently and inaccurately does not provide for the Pace Cure Cost.

8. Pace submits this Response and Limited Objection solely to preserve its existing Cure Cost and in all other respects strongly supports the confirmation of the Plan.

9. For the foregoing reasons, Pace respectfully requests that the Court enter an Order confirming the Plan and amending Schedule C-2 of the Plan to accurately reflect the Pace Cure Cost as set forth above as continuing to accrue at the rate of \$14,000/month.

Dated: July 19, 2018

**COOPER LEVENSON, P.A.**  
Counsel for Pacetech, Inc.

By: Eric A. Browndorf /s/  
Eric A. Browndorf

By: Erin K. Brignola /s/  
Erin K. Brignola

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
VER TECHNOLOGIES	)	Case No. 18-10834-KG
HOLDCO LLC et al.,	)	
	)	(Joint Administration Requested)
Debtors. <sup>1</sup>	)	
_____	)	

**CERTIFICATE OF SERVICE**

This is to certify that I have on this day electronically filed the foregoing Response and Limited Objection To The Second Amended Joint Chapter 11 Plan of Reorganization using the Court’s CM/ECF filing system, which sends a notice of this filing and an accompanying link to this filing to all parties who have filed a notice of appearance in these cases under the Court’s CM/ECF system. Moreover, I further certify that on this day, I caused a copy of this filing be served via United States First Class mail, with adequate postage pre-paid, on the parties on the list attached hereto at the address shown for each.

Dated: July 2, 2018

COOPER LEVENSON, P.A.

/s/ Erin K. Brignola  
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*Counsel to: Vincent Pace and Pacetech, Inc.*

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: VER Technologies HoldCo LLC (7239); VER Technologies MidCo LLC (7482); VER Technologies LLC (7501); Full Throttle Films, LLC (0487); FAAST Leasing California, LLC (7857); Revolution Display, LLC (6711); VER Finco, LLC (5625); CPV Europe Investments LLC (2533); and Maxwell Bay Holdings LLC (3433). The location of the Debtors’ service address is: 757 West California Avenue, Building 4, Glendale, California 91203.

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