

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

In re:))	Chapter 11
VER TECHNOLOGIES HOLDCO LLC, <i>et al.</i> , ¹))	Case No. 18-10834 (CSS)
Reorganized Debtors.))	(Jointly Administered)
)		Re: Docket No. 1091

**CERTIFICATION OF NO OBJECTION REGARDING REORGANIZED
DEBTORS' FIFTH MOTION FOR ORDER EXTENDING THE PERIOD
TO REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452 AND
FEDERAL RULE OF BANKRUPTCY PROCEDURE 9027**

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection or other responsive pleading to the relief requested in the *Reorganized Debtor's Fifth Motion for Order Extending the Period to Remove Actions Pursuant to 28 U.S.C. § 1452 and Federal Rule of Bankruptcy Procedure 9027* (the "Motion") [Docket No. 1091] filed on July 27, 2020. The undersigned further certifies that he has caused the Court's docket in this case to be reviewed and no answer, objection or other responsive pleading to the relief requested in the Motion appears thereon. Pursuant to the *Notice of Hearing Regarding Reorganized Debtor's Fifth Motion for Order Extending the Period to Remove Actions Pursuant to 28 U.S.C. § 1452 and Federal Rule of Bankruptcy Procedure 9027* (the "Notice") [Docket No. 1091], responses to the Motion were to be filed and served no later than August 5, 2020 at 4:00 p.m. prevailing Eastern Time

¹ The Reorganized 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); CPV Europe Investments LLC (2533); FAAST Leasing California, LLC (7857); Full Throttle Films, LLC (0487); Maxwell Bay Holdings LLC (3433); Revolution Display, LLC (6711); VER Finco, LLC (5625); VER Technologies LLC (7501); and VER Technologies MidCo LLC (7482). The location of the Debtors' service address is: 757 West California Avenue, Building 4, Glendale, California 91203.



It is hereby respectfully requested that the proposed order attached hereto as Exhibit A be entered at the Court's earliest convenience.

Dated: August 7, 2020
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

Laura Davis Jones (DE Bar No. 2436)
Peter J. Keane (DE Bar No. 5503)
919 N. Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
pkeane@pszjlaw.com

and-

Joseph T. Moldovan (admitted pro hac vice)
David J. Kozlowski (admitted pro hac vice)
MORRISON COHEN LLP
909 Third Avenue
New York, NY 10022
Telephone: (212) 735-8600
Facsimile:(212) 735-8708
Email: jmoldovan@morrisoncohen.com
dkozlowski@morrisoncohen.com

Co-Counsel for the Reorganized Debtor

Exhibit A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	
)	Chapter 11
)	
VER TECHNOLOGIES HOLDCO LLC, <i>et al.</i> , ¹)	Case No. 18-10834 (KG)
)	
Reorganized Debtors.)	(Jointly Administered)
)	
)	Re: Docket No. 1091

FIFTH ORDER EXTENDING THE PERIOD TO
REMOVE ACTIONS PURSUANT TO 28 U.S.C. § 1452 AND
FEDERAL RULE OF BANKRUPTCY PROCEDURE 9027
THROUGH AND INCLUDING FEBRUARY 22, 2021

Upon the motion (the "Motion")² of the Debtors, and through the merger effectuated via the Plan, Production Resource Group Inc. ("PRG"; together with the Debtors, the "Reorganized Debtor"), for entry of an order (this "Order") further extending the period within which the Reorganized Debtor may remove actions pursuant to 28 U.S.C. § 1452 and Rule 9027 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), as more fully set forth in the Motion; and it appearing that this Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334, the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated February 29, 2012, and Article X of the Plan; and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§

¹ 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); CPV Europe Investments LLC (2533); FFAST Leasing California, LLC (7857); Full Throttle Films, LLC (0487); Maxwell Bay Holdings LLC (3433); Revolution Display, LLC (6711); VER Finco, LLC (5625); VER Technologies LLC (7501); and VER Technologies MidCo LLC (7482). The location of the Debtors' service address is: 757 West California Avenue, Building 4, Glendale, California 91203.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

1408 and 1409; and due and proper notice having been provided to the parties provided for in the Motion and no further notice being necessary; and the legal and factual bases set forth in the Motion establishing just and sufficient cause to grant the relief requested therein; and the relief granted herein being in the best interests of the Reorganized Debtor, the estates, creditors, and all parties in interest; and upon due deliberation given, IT IS HEREBY ORDERED THAT:

1. The time period provided by Bankruptcy Rule 9027 within which the Reorganized Debtor may file notices of removal of related proceedings under Bankruptcy Rule 9027(a)(2) is enlarged and extended through and including February 22, 2021 (the “Pre-Petition Removal Deadline”).

2. The Pre-Petition Removal Deadline applies to all matters specified in Bankruptcy Rule 9027(a)(2)(A), (B), (C).

3. The time period provided by Bankruptcy Rule 9027 within which the Reorganized Debtor may file notices of removal of related proceedings under Bankruptcy Rule 9027(a)(3) is enlarged and extended to the later of (i) February 22, 2021, and (ii) the time period specified in Bankruptcy Rule 9027(a)(3)(A) and (B) (i.e. the shorter of (A) 30 days after receipt, through service or otherwise, of a copy of the initial pleading setting forth the claim or cause of action sought to be removed, or (B) 30 days after receipt of the summons if the initial pleading has been filed with the court but not served with the summons) (the “Post-Petition Removal Deadline”).

4. The Post-Petition Removal Deadline applies to all matters specified in Bankruptcy Rule 9027(a)(3).

5. This Order is without prejudice to the Reorganized Debtor’s rights to seek further extensions of the time within which to remove related proceedings.

6. This Court shall retain jurisdiction over all matters arising from or related to the implementation, interpretation, or enforcement of this Order.