

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Vewd Software USA, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 21-12065 (MEW)

(Jointly Administered)

**NOTICE OF DEADLINES
REQUIRING FILING OF PROOFS OF CLAIM**

TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST THE DEBTORS LISTED BELOW:

The United States Bankruptcy Court for the Southern District of New York (the “Court”) has entered an order (the “Bar Date Order”) establishing the following Bar Dates:

(1) **March 18, 2022** (the “General Bar Date”) as the last date for each person or entity (including individuals, partnerships, corporations, joint ventures, and trusts, but not governmental units (as such term is defined in section 101(27) of the Bankruptcy Code (“Governmental Units”)) to file a proof of claim in respect of a claim that arose before **December 15, 2021** (the “Petition Date”) against any of the debtors listed below (collectively, the “Debtors”); and

(2) **June 13, 2022** (the “Governmental Bar Date”) as the last date for each Governmental Unit to file a proof of claim in respect of a claim that arose before the Petition Date against any of the Debtors.

The Bar Date Order, the Bar Dates, and the procedures set forth below for filing proofs of claim apply to all claims against the Debtors, other than those set forth in Section 4 below as being specifically excluded.

<u>Debtor</u>	<u>Last Four Digits of Tax Identification Number</u>	<u>Case Number</u>
Vewd Software USA, LLC	9013	21-12065
Vewd Software AS	8011	21-12066
Last Lion Holdco AS	4926	21-12067

¹ The Debtors in these chapter 11 cases, for which joint administration has been granted, along with the last four digits of their tax identification numbers, are as follows: Vewd Software USA, LLC (9013); Vewd Software AS (8011); and Last Lion Holdco AS (4926).

1. WHO MUST FILE A PROOF OF CLAIM

You **MUST** file a proof of claim to share in distributions from the Debtors' bankruptcy estates if you have a claim that arose prior to the Petition Date, and it is not one of the types of claim described in Section 4 below. Claims based on acts or omissions of the Debtors that occurred before the Petition Date must be filed on or prior to the applicable Bar Date, even if such claims are not now fixed, liquidated, or certain or did not mature or become fixed, liquidated, or certain before the Petition Date.

Distributions to holders of allowed claims from the Debtors' bankruptcy estates will be made pursuant to the *Second Amended Joint Prepackaged Chapter 11 Plan of Reorganization of Vewd Software USA, LLC and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 130, Ex. 1] (the "Plan"). Article III.C of Plan provides that holders of Allowed General Unsecured Claims (as defined in the Plan) shall be Unimpaired (as defined in the Plan). In order for a claim that arose prior to the Petition Date to be an Allowed General Unsecured Claim and receive such treatment rendering it Unimpaired, a proof of claim must be filed on or prior to the applicable Bar Date, unless it is one of the types of claims described in Section 4 below.

Under Section 101(5) of the Bankruptcy Code and as used in this Notice, the word "claim" means: (a) a right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (b) a right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

2. WHAT TO FILE

Your filed proof of claim must conform substantially to Official Form No. 410. The Debtors are enclosing a case-specific proof of claim form for use in these cases. You may utilize the proof of claim form(s) provided by the Debtors to file your claim. Additional proof of claim forms may be obtained at <http://www.kccllc.net/vewd> or at www.uscourts.gov/forms/bankruptcy-forms (each such form, a "Proof of Claim Form").

All Proof of Claim Forms must be **signed** by the claimant or, if the claimant is not an individual, by an authorized agent of the claimant. It must be written in English and be denominated in United States currency (using the exchange rate, if applicable, as of the Petition Date). You should attach to your completed Proof of Claim Form any documents on which the claim is based (if voluminous, attach a summary) or an explanation as to why the documents are not available.

Your Proof of Claim Form must **not** contain complete social security numbers or taxpayer identification numbers (only the last four (4) digits), a complete birth date (only the year), the name of a minor (only the minor's initials) or a financial account number (only the last four digits of such financial account).

IF YOU ARE ASSERTING A CLAIM AGAINST MORE THAN ONE DEBTOR OR HAVE CLAIMS AGAINST DIFFERENT DEBTORS, SEPARATE PROOFS OF CLAIM MUST

BE FILED AGAINST EACH SUCH DEBTOR AND YOU MUST IDENTIFY ON YOUR PROOF OF CLAIM THE SPECIFIC DEBTOR AGAINST WHICH YOUR CLAIM IS ASSERTED AND THE CASE NUMBER OF THAT DEBTOR'S BANKRUPTCY CASE. A LIST OF THE NAMES OF THE DEBTORS AND THEIR CASE NUMBERS IS SET FORTH ABOVE.

3. WHEN AND WHERE TO FILE

Except as provided for herein, all proofs of claim must be filed so as to be **actually received** on or before the applicable Bar Date (i) electronically through the website of the Debtors' claims agent, Kurtzman Carson Consultants LLC ("**KCC**"), using the interface available on such website located at <http://www.kccllc.net/vewd> under the link entitled "Submit a Claim" (the "**Electronic Filing System**") or (ii) by delivering the original Proof of Claim Form by hand, or mailing the original Proof of Claim Form on or before the applicable Bar Date as follows:

Delivery by first-class U.S. mail, overnight mail, or hand delivery:	Vewd Software Ballot Processing Center c/o KCC 222 N. Pacific Coast Highway, Suite 300 El Segundo, CA 90245
Hand delivery only:	United States Bankruptcy Court Southern District of New York One Bowling Green New York, New York 10004-1408

Proofs of claim will be deemed timely filed only if **actually received** by KCC or the Court as set forth in Section 3 above, in each case, on or before the applicable Bar Date. Proofs of claim sent by facsimile, telecopy, or electronic mail submission (other than proofs of claim filed electronically through the Electronic Filing System) **will not** be accepted.

4. CLAIMS FOR WHICH PROOFS OF CLAIM NEED NOT BE FILED

You do **not** need to file a proof of claim on behalf of a claim on or prior to the applicable Bar Date if the claim falls into one of the following categories:

- (a) any claim that has already been asserted in a proof of claim against the Debtors in the above-captioned cases in a form substantially similar to Official Bankruptcy Form No. 410 (unless you wish to assert the claim against a Debtor not mentioned in the prior proof of claim, in which case an additional proof of claim must be filed);
- (b) any claim that is listed on the Schedules filed by the Debtors; provided, that (i) the claim is not listed on the Schedules as "disputed," "contingent," or "unliquidated," (ii) the claimant does not disagree with the amount, nature, and priority of the claim as set forth in the Schedules, and (iii) the claimant does not dispute that the claim is an obligation only of the specific Debtor against which the claim is listed in the Schedules;

- (c) any claim that previously has been allowed by Order of the Court;
- (d) any claim that has been paid in full by any of the Debtors;
- (e) any claim for which a different deadline has previously been fixed by the Court;
- (f) any claim by one Debtor against another Debtor, or any claim by any of the non-Debtor subsidiaries of the Debtors having a claim against any of the Debtors;
- (g) any claim allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an expense of administration of the Debtor's estate; *provided* that any claim under section 503(b)(9) of the Bankruptcy Code must be asserted by filing a request for payment or a proof of claim on or prior to the General Bar Date;
- (h) any person or entity that holds an equity security interest in the Debtors; *provided*, that if any such holder asserts a claim (as opposed to an ownership interest) against a Debtor (including a claim relating to an equity interest or the purchase or sale of such equity interest), a proof of claim must be filed on or before the applicable Bar Date;
- (i) any current employee of the Debtors, solely with respect to any claim related to wages, salaries, vacation or other compensation arising in the ordinary course of business and authorized to be paid by order of the Court including a final order approving the *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, Benefit Obligations, and Reimbursable Expenses and (B) Continue Employee Compensation and Benefits Programs and (II) Granting Related Relief* [Docket No. 6]; *provided*, that if the Debtors provide written notice to any current employee stating that the Debtors do not intend to exercise their authority to pay such claim, such employee shall have until the later of (i) the General Bar Date, and (ii) 30 days from the date of service of such written notice to file a Proof of Claim; *provided, further*, that a current employee must submit a Proof of Claim by the General Bar Date for all other claims arising before the Petition Date, including claims for wrongful termination, discrimination, harassment, hostile work environment, and retaliation;
- (j) any current or former officer, manager, or director of the Debtors asserting Claims for indemnification, contribution, or reimbursement arising as a result of such officer's, manager's, or director's prepetition or postpetition services to the Debtors;
- (k) any claim arising pursuant to the Credit Agreement, dated as of December 19, 2016 (as amended, supplemented, or otherwise modified from time to time, the "Prepetition Credit Agreement") among Last Lion Holdco AS as borrower, Vewd Software AS, the subsidiary guarantors party thereto, the financial institutions party thereto as lenders, and Wilmington Trust, National Association as administrative agent and collateral agent, and all other agreements, documents, instruments, and amendments related thereto, including the "Loan Documents" as

defined in the Prepetition Credit Agreement (in each case as amended, supplemented, or otherwise modified from time to time, the “Prepetition Credit Agreement Documents”), including claims with respect to accrued and unpaid principal, interest, fees, costs, and out-of-pocket expenses including, without limitation, reasonable and documented attorney’s fees, agent’s fees, other professional fees, and disbursements and all other obligations arising under or in connection with the Prepetition Credit Agreement Documents, in each case which claims have been allowed pursuant to the *Final Order (A) Authorizing the Debtors to (I) Obtain Postpetition Financing, (II) Use Cash Collateral, (III) Grant Senior Secured Liens and Provide Claims with Superpriority Administrative Expense Status and (IV) Grant Adequate Protection to the Prepetition Secured Parties, (B) Modifying the Automatic Stay, and (C) Granting Related Relief* [Docket No. 127];

- (l) any claim arising pursuant to the Senior Secured Superpriority Debtor-in-Possession Term Loan Credit Agreement, dated as of December 20, 2021 (as amended, supplemented, or otherwise modified from time to time, the “DIP Credit Agreement”), among Vewd Software AS as borrower, Last Lion Holdco AS, the subsidiary guarantors party thereto, the financial institutions party thereto as lenders, and Wilmington Trust, National Association as administrative agent and collateral agent, and all other agreements, documents, instruments, and amendments related thereto, including the “DIP Orders” and the “Loan Documents” as defined in the DIP Credit Agreement (in each case as may be amended, supplemented, or otherwise modified from time to time, the “DIP Credit Agreement Documents”), including claims with respect to accrued and unpaid principal, interest, fees, costs, and out-of-pocket expenses including, without limitation, reasonable and documented attorney’s fees, agent’s fees, other professional fees and disbursements, and all other obligations arising under or in connection with the DIP Credit Agreement Documents, in each case which claims have been allowed pursuant to the DIP Orders; and
- (m) any party that is exempt from filing a proof of claim pursuant to an order of this Court in these chapter 11 cases.

This Notice is being sent to many persons and entities that have had some relationship with or have done business with the Debtors but may not have an unpaid claim against the Debtors. The fact that you have received this Notice does not mean that you have a claim or that the Debtors or the Court believe that you have a claim against the Debtors.

5. EXECUTORY CONTRACTS AND UNEXPIRED LEASES

Notwithstanding anything to the contrary in the *Findings of Fact, Conclusions of Law, and Order (I) Approving the Adequacy of the Disclosure Statement and (II) Confirming the Second Amended Joint Prepackaged Chapter 11 Plan of Reorganization of Vewd Software USA, LLC, and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 130], if you hold a claim arising from the rejection of an executory contract or unexpired lease (a) pursuant to the Plan, or (b) as to which the order authorizing such rejection is dated on or before the date of entry of the Bar Date Order, you must file a proof of claim based on such rejection on or before the

General Bar Date. If you hold a claim arising from the rejection of an executory contract or unexpired lease, as to which the order authorizing such rejection is dated after the date of entry of the Bar Date Order, you must file a proof of claim on or before such date as the Court may fix in the applicable order authorizing such rejection; and if no such date is provided, by the date that is thirty (30) days after entry of the order authorizing such rejection (the “Rejection Damages Bar Date”).

6. CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM BY THE BAR DATE

ANY HOLDER OF A CLAIM THAT IS NOT EXEMPTED FROM THE REQUIREMENTS OF THE BAR DATE ORDER, AS SET FORTH IN SECTION 4 ABOVE, AND THAT FAILS TO TIMELY FILE A PROOF OF CLAIM IN THE APPROPRIATE FORM SHALL (I) **NOT** BE TREATED AS A CREDITOR WITH RESPECT TO SUCH CLAIM FOR THE PURPOSES OF PARTICIPATING IN ANY DISTRIBUTION IN THE DEBTORS’ CASES ON ACCOUNT OF SUCH CLAIM UNDER THE AMENDED JOINT PREPACKAGED CHAPTER 11 PLAN OF REORGANIZATION OF VEWD SOFTWARE USA, LLC AND ITS DEBTOR AFFILIATES PURSUANT TO CHAPTER 11 OF THE BANKRUPTCY CODE DATED AS OF JANUARY 19, 2022 [DOCKET NO. 75] (AS AMENDED, SUPPLEMENTED, OR OTHERWISE MODIFIED FROM TIME TO TIME, THE “PLAN”) AND (II) BE BOUND BY THE TERMS OF THE PLAN AS CONFIRMED BY THE COURT.

7. THE DEBTORS’ SCHEDULES AND ACCESS THERETO

You may be listed as the holder of a claim against one or more of the Debtors in the Debtors’ Schedules of Assets and Liabilities (collectively, the “Schedules”).

IF YOU RELY ON THE DEBTORS’ SCHEDULES IT IS YOUR RESPONSIBILITY TO DETERMINE THAT THE CLAIM ACCURATELY IS LISTED ON THE SCHEDULES.

As set forth above, if you agree with the nature, amount and status of your claim as listed in the Debtors’ Schedules, and if you do not dispute that your claim is only against the Debtor specified by the Debtors, and if your claim is not described as “disputed,” “contingent,” or “unliquidated,” you need **not** file a Proof of Claim. Otherwise, or if you decide to file a Proof of Claim, you must do so before the applicable Bar Date in accordance with the procedures set forth in this Notice.

In the event the Debtors amend or supplement their Schedules after the entry of the Bar Date Order, and you hold a claim affected by the Debtors’ amendment(s) or supplement(s), the Debtors will provide you with notice in a form substantially similar to the Bar Date Notice, that will clearly set forth the date by which you must submit a Proof of Claim (and which shall be at least 30 days from the date of such notice) (each such date, a “Supplemental Bar Date”).

Copies of the Debtors’ Schedules, the Bar Date Order, and other information regarding these chapter 11 cases are available for inspection on the Court’s electronic docket for the Debtors’ chapter 11 cases, which is posted on (a) the website established by KCC for the Debtors’ cases at <http://www.kccllc.net/vewd> and (b) on the Court’s website at <http://www.nysb.uscourts.gov>. A

login and password to the Court's Public Access to Electronic Records ("PACER") are required to access this information on the Court's website and can be obtained through the PACER Service Center at <http://www.pacer.gov>. Copies of the Debtors' Schedules also may be obtained by written request to KCC:

Vewd Software Claims Processing Center
c/o KCC LLC
222 N. Pacific Coast Highway, Suite 300
El Segundo, CA 90245

A holder of a possible claim against the Debtors should consult an attorney regarding any matters not covered by this notice, such as whether the holder should file a Proof of Claim.

Dated: New York, New York
February 3, 2022

BY ORDER OF THE COURT

/s/ Gregg M. Galardi
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and Debtors in Possession*
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If you have questions about this notice, please contact the Debtors' Claims and Noticing Agent, Kurtzman Carson Consultants LLC, at (866) 967-0676 (U.S. toll-free) or +1 (310) 751-2676 (International callers), or by email at VewdInfo@kcellc.com. You may also find out more information at <http://www.kcellc.net/vewd>.