

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

SFX ENTERTAINMENT, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 16-10238 (MFW)

(Jointly Administered)

Ref. Docket Nos. 1293, 1386

**CERTIFICATION OF COUNSEL REQUESTING ENTRY OF
ORDER APPROVING STIPULATION EXTENDING DEBTORS' TIME
TO OBJECT TO M&M/ID&T'S ADMINISTRATIVE EXPENSE MOTION**

The undersigned counsel to the above-captioned debtors (the “**Debtors**”) in the above-captioned cases hereby certifies that:

1. On January 3, 2017, M&M Management BVBA and ID&T BVBA (collectively, “**M&M/ID&T**”) filed the *Request of M&M Management BVBA and ID&T BVBA for Allowance and Payment of Administrative Expense Claim* (the “**Motion**”) [D.I. 1386].

2. The Debtors’ deadline to object to the Motion is March 2, 2017 (the “**Objection Deadline**”).

3. The Debtors and M&M/ID&T wish to extend the Objection Deadline to the Motion to **May 2, 2017**, and have entered into the *Stipulation Extending Debtors’ Time to*

¹ The Debtors in the chapter 11 cases, along with the last four (4) digits of each Debtor’s federal tax identification number, if applicable, are: 430R Acquisition LLC (7350); Beatport, LLC (1024); Core Productions LLC (3613); EZ Festivals, LLC (2693); Flavorus, Inc. (7119); ID&T/SFX Mysteryland LLC (6459); ID&T/SFX North America LLC (5154); ID&T/SFX Q-Dance LLC (6298); ID&T/SFX Sensation LLC (6460); ID&T/SFX TomorrowWorld LLC (7238); LETMA Acquisition LLC (0452); Made Event, LLC (1127); Michigan JJ Holdings LLC (n/a); SFX Acquisition, LLC (1063); SFX Brazil LLC (0047); SFX Canada Inc. (7070); SFX Development LLC (2102); SFX EDM Holdings Corporation (2460); SFX Entertainment, Inc. (0047); SFX Entertainment International, Inc. (2987); SFX Entertainment International II, Inc. (1998); SFX Intermediate Holdco II LLC (5954); SFX Managing Member Inc. (2428); SFX Marketing LLC (7734); SFX Platform & Sponsorship LLC (9234); SFX Technology Services, Inc. (0402); SFX/AB Live Event Canada, Inc. (6422); SFX/AB Live Event Intermediate Holdco LLC (8004); SFX/AB Live Event LLC (9703); SFX-94 LLC (5884); SFX-Disco Intermediate Holdco LLC (5441); SFX-Disco Operating LLC (5441); SFXE IP LLC (0047); SFX-EMC, Inc. (7765); SFX-Hudson LLC (0047); SFX-IDT N.A. Holding II LLC (4860); SFX-LIC Operating LLC (0950); SFX-IDT N.A. Holding LLC (2428); SFX-Nightlife Operating LLC (4673); SFX-Perryscope LLC (4724); SFX-React Operating LLC (0584); Spring Awakening, LLC (6390); SFXE Netherlands Holdings Coöperatief U.A. (6812); SFXE Netherlands Holdings B.V. (6898). The Debtors’ business address is 524 Broadway, 11th Floor, New York, NY 10012.



Object M&M/ID&T's Administrative Expense Motion (the “**Stipulation**”), attached as **Exhibit 1** to the proposed form of order (the “**Order**”) attached hereto as **Exhibit A**.

4. The Stipulation and proposed Order was circulated to, reviewed by, and consented to by counsel to the Litigation Trustee, who was appointed pursuant to the Debtors’ confirmed Plan [D.I. 1293].

5. The Debtors respectfully request that this Court enter the Order approving the Stipulation at its earliest convenience.

Dated: February 21, 2017

GREENBERG TRAURIG, LLP

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Exhibit A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

SFX ENTERTAINMENT, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 16-10238 (MFW)

(Jointly Administered)

**ORDER APPROVING STIPULATION EXTENDING DEBTORS' TIME
TO OBJECT TO M&M/ID&T'S ADMINISTRATIVE EXPENSE MOTION**

Upon consideration of the stipulation (the "**Stipulation**") by and between SFX Entertainment, Inc. and its affiliated debtors, M&M Management BVBA, and ID&T BVBA, attached hereto as **Exhibit 1**; and after due deliberation and good and sufficient cause appearing therefor:

IT IS HEREBY ORDERED THAT:

1. The Stipulation attached hereto as **Exhibit 1** is hereby APPROVED in accordance with its terms and is incorporated herein by this reference.

Dated: _____, 2017

HONORABLE MARY F. WALRATH
UNITED STATES BANKRUPTCY JUDGE

¹ The Debtors in the chapter 11 cases, along with the last four (4) digits of each Debtor's federal tax identification number, if applicable, are: 430R Acquisition LLC (7350); Beatport, LLC (1024); Core Productions LLC (3613); EZ Festivals, LLC (2693); Flavorus, Inc. (7119); ID&T/SFX Mysteryland LLC (6459); ID&T/SFX North America LLC (5154); ID&T/SFX Q-Dance LLC (6298); ID&T/SFX Sensation LLC (6460); ID&T/SFX TomorrowWorld LLC (7238); LETMA Acquisition LLC (0452); Made Event, LLC (1127); Michigan JJ Holdings LLC (n/a); SFX Acquisition, LLC (1063); SFX Brazil LLC (0047); SFX Canada Inc. (7070); SFX Development LLC (2102); SFX EDM Holdings Corporation (2460); SFX Entertainment, Inc. (0047); SFX Entertainment International, Inc. (2987); SFX Entertainment International II, Inc. (1998); SFX Intermediate Holdco II LLC (5954); SFX Managing Member Inc. (2428); SFX Marketing LLC (7734); SFX Platform & Sponsorship LLC (9234); SFX Technology Services, Inc. (0402); SFX/AB Live Event Canada, Inc. (6422); SFX/AB Live Event Intermediate Holdco LLC (8004); SFX/AB Live Event LLC (9703); SFX-94 LLC (5884); SFX-Disco Intermediate Holdco LLC (5441); SFX-Disco Operating LLC (5441); SFXE IP LLC (0047); SFX-EMC, Inc. (7765); SFX-Hudson LLC (0047); SFX-IDT N.A. Holding II LLC (4860); SFX-LIC Operating LLC (0950); SFX-IDT N.A. Holding LLC (2428); SFX-Nightlife Operating LLC (4673); SFX-Perryscope LLC (4724); SFX-React Operating LLC (0584); Spring Awakening, LLC (6390); SFXE Netherlands Holdings Coöperatief U.A. (6812); SFXE Netherlands Holdings B.V. (6898). The Debtors' business address is 524 Broadway, 11th Floor, New York, NY 10012.

Exhibit 1

Stipulation

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

In re:

SFX ENTERTAINMENT, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 16-10238 (MFW)

(Jointly Administered)

**STIPULATION EXTENDING DEBTORS' TIME
TO OBJECT TO M&M/ID&T'S ADMINISTRATIVE EXPENSE MOTION**

SFX Entertainment, Inc. and its affiliated debtors (collectively, the “**Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”) and M&M Management BVBA and ID&T BVBA (collectively, “**M&M/ID&T**” and together with the Debtors, the “**Parties**”) hereby stipulate and agree to the following (the “**Stipulation**”):

Recitals

WHEREAS, on February 1, 2016, the above-captioned Debtors commenced the Chapter 11 Cases by filing voluntary petitions for relief under chapter 11 of title 11 of the United States Code with the United States Bankruptcy Court for the District of Delaware (the “**Bankruptcy Court**”).

¹ The Debtors in the chapter 11 cases, along with the last four (4) digits of each Debtor’s federal tax identification number, if applicable, are: 430R Acquisition LLC (7350); Beatport, LLC (1024); Core Productions LLC (3613); EZ Festivals, LLC (2693); Flavorus, Inc. (7119); ID&T/SFX Mysteryland LLC (6459); ID&T/SFX North America LLC (5154); ID&T/SFX Q-Dance LLC (6298); ID&T/SFX Sensation LLC (6460); ID&T/SFX TomorrowWorld LLC (7238); LETMA Acquisition LLC (0452); Made Event, LLC (1127); Michigan JJ Holdings LLC (n/a); SFX Acquisition, LLC (1063); SFX Brazil LLC (0047); SFX Canada Inc. (7070); SFX Development LLC (2102); SFX EDM Holdings Corporation (2460); SFX Entertainment, Inc. (0047); SFX Entertainment International, Inc. (2987); SFX Entertainment International II, Inc. (1998); SFX Intermediate Holdco II LLC (5954); SFX Managing Member Inc. (2428); SFX Marketing LLC (7734); SFX Platform & Sponsorship LLC (9234); SFX Technology Services, Inc. (0402); SFX/AB Live Event Canada, Inc. (6422); SFX/AB Live Event Intermediate Holdco LLC (8004); SFX/AB Live Event LLC (9703); SFX-94 LLC (5884); SFX-Disco Intermediate Holdco LLC (5441); SFX-Disco Operating LLC (5441); SFXE IP LLC (0047); SFX-EMC, Inc. (7765); SFX-Hudson LLC (0047); SFX-IDT N.A. Holding II LLC (4860); SFX-LIC Operating LLC (0950); SFX-IDT N.A. Holding LLC (2428); SFX-Nightlife Operating LLC (4673); SFX-Perryscope LLC (4724); SFX-React Operating LLC (0584); Spring Awakening, LLC (6390); SFXE Netherlands Holdings Coöperatief U.A. (6812); SFXE Netherlands Holdings B.V. (6898). The Debtors’ business address is 524 Broadway, 11th Floor, New York, NY 10012.

WHEREAS, on November 15, 2016, the Bankruptcy Court entered an Order (the “**Confirmation Order**”) [D.I. 1293] confirming the *Fifth Amended Joint Plan of Reorganization of SFX Entertainment, Inc. et al., under Chapter 11 of the Bankruptcy Code (as Modified)* (the “**Plan**”) [D.I. 1293-1].

WHEREAS, the Plan went effective on December 2, 2016.

WHEREAS, pursuant to the Confirmation Order and Plan, the Debtors have the right to object, settle, and otherwise comprise M&M/ID&T’s Claims against the Debtors.

WHEREAS, on January 3, 2017, M&M/ID&T filed the *Request of M&M Management BVBA and ID&T BVBA for Allowance and Payment of Administrative Expense Claim* (the “**Motion**”) [D.I. 1386].

WHEREAS, pursuant to the Confirmation Order and Plan, the Debtors’ deadline to object to the Motion is March 2, 2017 (the “**Objection Deadline**”), or such other date ordered by the Bankruptcy Court.

WHEREAS, the Parties wish to enter into the Stipulation extending the Objection Deadline, without prejudice to the Parties’ right to request a further extension.

NOW, THEREFORE, based on the foregoing and subject to the Bankruptcy Court’s approval, the Parties agree as follows:

Stipulation

1. The foregoing recitals are hereby fully incorporated into and made an express part of this Stipulation.

2. Upon approval of this Stipulation by the Bankruptcy Court, the Debtors’ Objection Deadline with respect to the Motion is extended through and including **May 2, 2017**.

3. The Stipulation is without prejudice to the Parties’ right to request a further extension of the Objection Deadline.

4. This Stipulation is subject to the approval of the Bankruptcy Court and shall be of no force and effect unless and until the Bankruptcy Court enters an order approving the same. If the Stipulation is not approved by the Bankruptcy Court, this Stipulation shall be null and void.

5. This Stipulation may be executed in one or more counterparts, each of which shall constitute an original, but all of which, when taken together, shall constitute one and the same instrument.

6. This Stipulation may be executed and delivered by electronic signature.

7. Nothing in this Stipulation is intended to nor shall it be construed, as consent by M&M/ID&T to jurisdiction in the United States of America, the Bankruptcy Court, or as a waiver to M&M/ID&T's right to compel arbitration.

[Signature Page Follows]

Dated: February 21, 2017

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Dated: February 21, 2017

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