

HEARING DATE AND TIME: SEPTEMBER 2, 2015 AT 10:00 A.M. (PREVAILING EASTERN TIME)
Response Deadline: August 26, 2015 at 4:00 p.m. (Prevailing Eastern Time)

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Attorneys for RKA Film Financing, LLC

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

In re:)	
)	Chapter 11
RELATIVITY FASHION, LLC., <i>et al.</i>)	Case No. 15-11989 (MEW)
)	
Debtors.)	(Jointly Administered)
)	
)	
)	

**NOTICE OF PRESENTMENT OF RKA FILM FINANCING, LLC’S MOTION FOR
(I) ADEQUATE PROTECTION OR
(II) RELIEF FROM THE AUTOMATIC STAY**

PLEASE TAKE NOTICE that RKA Film Financing, LLC (“**RKA**”), by its undersigned counsel, will present the *Motion of RKA Financing, LLC for (I) Adequate Protection or (II) Relief from the Automatic Stay* [Docket No.147] to the Honorable Michael E. Wise, United States Bankruptcy Judge, for approval and signature at the United States Bankruptcy Court of the Southern District of New York, Courtroom 617, One Bowling Green, New York,

NY 10004 on **September 2, 2015 at 10:00 a.m. (Prevailing Eastern Time)** or as soon thereafter as counsel can be heard, for entry of the Order attached to the Motion.

PLEASE TAKE FURTHER NOTICE that any responses or objections (“**Objections**”) to the entry of the attached Order shall be filed electronically with the Court on the docket of *In re: Relativity Fashion, LLC, et al.*, Case No. 15-11989, pursuant to the Court’s General Order M-399 (available at <http://www.nysb.uscourts.gov/sites/default/files/m399.pdf>), by registered users of the Court’s case filing system and by all other parties in interest on a 3.5 inch disc, preferably in portable document format, Microsoft Word or any other Windows-based word processing format, and served on (i) the Chambers of the Honorable Michael E. Wiles, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004; (ii) the Debtors ([REDACTED]) and their counsel (Sheppard Mullin Richter & Hampton LLP, 30 Rockefeller Plaza, New York, NY 10112, Attn: Craig A. Wolfe, Esq., Malani J. Cademartori, Esq. and Blanka K. Wolfe, Esq., and Jones Day, 222 East 41st Street, New York, NY 10017, Attn: Richard L. Wynne, Esq., Bennett L. Spiegel, Esq. and Lori Sinanyan, Esq.; (iii) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: Serene Nakano and Susan Golden); (iv) the attorneys for any statutory committee of unsecured creditors; (v) counsel to any other statutory committee appointed in these chapter 11 cases; (vi) counsel to the Ad Hoc Group of Term Loan Lenders, the DIP Lender and the Stalking Horse Bidder, Milbank, Tweed, Hadley & McCloy LLP, 601 South Figueroa Street, 30th Floor, Los Angeles, CA 90017, Attn: Mark Shinderman, Esq. and Haig H. Maghakian, Esq., and Milbank, Tweed, Hadley & McCloy LLP, 28 Liberty Street, New York, NY 10005, Attn: Dennis C. O’Donnell, Esq. and Matthew Brod, Esq.; (vii) counsel to Cortland Capital Market Services

LLC, Kaye Scholer LLP, Three First National Plaza, 70 West Madison Street, Suite 4200, Chicago, IL 60602, Attn: Daniel J. Hartnett, Esq. and Seth Kleinman, Esq.; (viii) counsel to CB Agency Services, LLC, Schulte Roth & Zabel LLP, 919 Third Avenue, New York, NY 10022, Attn: Marc B. Friess, Esq. and Parker J. Milender, Esq.; (ix) counsel for RKA Film Financing, LLC, Latham & Watkins LLP, 885 Third Avenue, New York, NY 10022, Attn: Christopher J. Clark, Keith A. Simon, Esq., Benjamin A. Naftalis, Esq., and Matthew S. Salerno, Esq., and Latham & Watkins LLP, 330 North Wabash Ave., Suite 2800, Chicago, IL 60611, Attn: David S. Heller, Esq.; (x) counsel for Macquarie US Trading, LLC, Gibson, Dunn & Crutcher LLP, 333 South Grand Avenue, Los Angeles, CA 90071, Attn: Samuel A. Newman, Esq. and Daniel B. Denny, Esq., and Gibson, Dunn & Crutcher LLP, 200 Park Avenue, New York, NY 10166, Attn: J. Eric Wise, Esq. and Shira D. Weiner, Esq.; (xi) counsel for OneWest Bank N.A., Morgan, Lewis & Bockius LLP, 101 Park Avenue, New York, NY 10178, Attn: Glenn E. Siegel, Esq., and Morgan, Lewis & Bockius LLP, One Federal Street, Boston, MA 02110, Attn: Julia Frost-Davies, Esq. and Amelia C. Joiner, Esq.; (xii) counsel for Manchester Securities, O'Melveny & Myers LLP, 7 Times Square, New York, NY 10036, Attn: Daniel S. Shamah, Esq.; (xiii) Vine Film Finance Fund II LP, 1501 Broadway, Suite 1400, New York, NY 10036; (xiv) the Securities and Exchange Commission; (xv) the Internal Revenue Service; and (xvii) all entities that requested notice in these chapter 11 cases under Bankruptcy Rule 2002 **so as to be received no later than August 26, 2015 at 4:00 p.m.** (Prevailing Eastern Time) (the "**Objection Deadline**").

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served prior to the Objection Deadline, the relief requested in the Motion may be granted with no

further notice or opportunity to be heard. If an Objection is filed, a hearing will be scheduled by the Court.

Dated: New York, New York
August 12, 2015

Respectfully Submitted,

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