

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

In re:

ALAMO DRAFTHOUSE CINEMAS
HOLDINGS, LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 21-10474 (MFW)

(Jointly Administered)

Ref. Docket No. 643

**CERTIFICATION OF COUNSEL REGARDING *PROPOSED ORDER* APPROVING
STIPULATION GRANTING MICHELLE CORDIAL RELIEF FROM THE
AUTOMATIC STAY TO PURSUE STATE COURT ACTION AGAINST DEBTORS**

On March 3, 2021 (the “**Petition Date**”), Alamo Drafthouse Cinemas Holdings, LLC and its above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) filed voluntary petitions in this Court for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “**Bankruptcy Code**”).

On August 4, 2021, Michelle Cordial, by and through counsel (the “**Claimants**,” and together with the Debtors, the “**Parties**”) filed the *Motion of Michelle Cordial, for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) of the Bankruptcy Code* [Docket No. 643] (the “**Motion**”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Alamo Drafthouse Cinemas Holdings, LLC (2205); Alamo Drafthouse Cinemas, LLC (5717); Alamo Vineland, LLC (1626); Alamo League Investments GP, LLC (1811); Alamo League Investments, Ltd. (7227); Alamo South Lamar GP, LLC (3632); Alamo South Lamar, LP (4563); Alamo Drafthouse Raleigh, LLC (5979); Alamo DH Anderson Lane, LLC (3642); Alamo Yonkers, LLC (4971); Alamo Mission, LLC (2284); Alamo Ritz, LLC (9465); Alamo Mueller, LLC (1221); Mondo Tees, LLC (6900); Alamo City Foundry, LLC (6092); Alamo Mainstreet, LLC (2052); Alamo City Point, LLC (3691); Alamo Liberty, LLC (5755); Alamo Satown, LLC (6197); Alamo Marketplace, LLC (7041); Alamo Stone Oak, LLC (8398); Alamo Westlakes, LLC (4931); Alamo Park North, LLC (1252); Alamo North SA, LLC (6623); Alamo Avenue B, LLC (8950); Alamo Slaughter Lane GP, LLC (6968); Alamo Slaughter Lane, Ltd. (5341); Alamo Cinema Group I GP, LLC (9537); Alamo Cinema Group I, LP (9656); Alamo Westminster, LLC (8906); Alamo Staten Island, LLC (7781); Alamo Aspen Grove, LLC (7786); Alamo Lakeline, LLC (5294); Alamo Sloans, LLC (9343). The location of the Debtors’ service address is: 3908 Avenue B, Austin, Texas 78751.

The Parties have conferred and engaged in good faith discussions regarding the Motion. As a result of those discussions, the Parties have agreed to the terms and conditions set forth in the *Stipulation Granting Michelle Cordial Relief From the Automatic Stay to Pursue State Court Action Against the Debtors*, a copy of which is attached as Exhibit 1 (the “**Stipulation**”)² to the proposed form order attached hereto as Exhibit A (the “**Proposed Order**”).

The Parties submit that modifying the Automatic Stay as set forth in the Stipulation and the Proposed Order is justified because, among other things, it will eliminate the need for motion practice, thereby minimizing the diminution of assets of the Debtors’ estates and furthering the interests of judicial efficiency.

Accordingly, the Claimants respectfully request that the Court enter the Proposed Order be entered at the Court’s earliest convenience without further notice or hearing.

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² Capitalized terms used but not otherwise defined herein have the meaning ascribed to them in the Stipulation.

Dated: August 25, 2021

Respectfully Submitted,

REGER RIZZO & DARNALL LLP

/s/ Louis J. Rizzo

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