



June 12, 2025

VIA FILE & SERVE~~X~~PRESS AND HAND DELIVERY

The Honorable Christian Douglas Wright
Delaware Court of Chancery
Leonard L. Williams Justice Center
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Re: *In re: LHIM Productions, LLC, Assignor,*
To: LHIMP (ABC), LLC, Assignee,
Consolidated Case No. 2023-0851-PAF

Dear Magistrate Wright:

On April 17, 2025, the Assignees in the above-captioned cases filed their Notice of Filing of Assignees' Status Report and Annual Accounting Pursuant to 10 Del. C. § 7385.

On May 29, 2025, after reviewing the Assignees' Status Report and Annual Accounting, the Court entered an Order requesting an explanation as to why subcontractors were engaged by the Assignees. After receipt of the Court's Order, the Assignees reviewed the original ABC Budget and Annual Accounting. The Assignees did benefit from "IM staff without compensation" as noted in the ABC Budget. It was determined after the preparation of the ABC Budget that IM staff would need to engage former employees to complete the necessary work to file final tax returns. This additional work was paid and classified as subcontractors. The Assignees had allowed



for \$75,000 of contingency/miscellaneous in the ABC Budget and intends to reduce the contingency/miscellaneous line item in the ABC Budget by \$18,556 to offset the amount used for subcontractors.

We are available at the Court's convenience if Your Honor has any questions.

Respectfully submitted,

WOMBLE BOND DICKINSON (US) LLP

/s/ Morgan L. Patterson
Morgan L. Patterson (#5388)

Counsel to Assignees

WORDS: 174