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Attorneys for Reorganized Debtor
METROPOLITAN THEATRES CORPORATION, a
California corporation

UNITED STATES BANKRUPTCY COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

In re:

METROPOLITAN THEATRES
CORPORATION, a California corporation,

Debtor.

TAX ID.: 95-1002289

Case No. 2:24-bk-11569-BR

Chapter 11 (Subchapter V)

**SECOND INTERIM AND FINAL
APPLICATION OF LOEB & LOEB LLP,
COUNSEL TO THE DEBTOR, FOR
APPROVAL OF FEES AND
REIMBURSEMENT OF EXPENSES FOR
THE (I) INTERIM PERIOD FROM
NOVEMBER 1, 2024 THROUGH
MARCH 31, 2025 AND (II) FINAL
PERIOD FROM FEBRUARY 29, 2024
THROUGH MARCH 31, 2025;
DECLARATIONS OF LANCE N.
JURICH AND DAVID CORWIN IN
SUPPORT THEREOF**

Hearing:

Date: June 3, 2025

Time: 10:00 A.M.

Courtroom: Courtroom 1668

255 East Temple St.

Los Angeles, CA 90012

1 **TO THE HONORABLE BARRY RUSSELL, UNITED STATES BANKRUPTCY**
2 **JUDGE FOR THE CENTRAL DISTRICT OF CALIFORNIA:**

3 Loeb & Loeb LLP ("**Loeb**"), general bankruptcy counsel for debtor and reorganized debtor
4 Metropolitan Theatres Corporation (the "**Debtor**" or "**MTC**"), hereby submits its Second Interim
5 and Final Application for Approval of Fees and Reimbursement of Expenses (the "**Application**")
6 for the period of February 29, 2024 through March 31, 2025 (the "**Employment Period**" or "**Final**
7 **Application Period**") pursuant to sections 327 and 330 of title 11 of the United States Bankruptcy
8 Code (the "**Bankruptcy Code**").

9
10 Pursuant to this Application, Loeb is seeking (a) approval on a final basis of fees and
11 expenses previously awarded on an interim basis for the period of February 29, 2024 through
12 October 31, 2024 (the "**First Interim Period**"), consisting of \$786,187.00 for services rendered and
13 \$2,336.13 for reasonable expenses incurred for a total of \$788,523.13 (the "**First Award**"); (b)
14 approval on a final basis of fees and expenses incurred for the period of November 1, 2024 through
15 March 31, 2025 (the "**Second Interim Period**"), consisting of \$171,842.50 for services rendered
16 and \$374.44 for reasonable expenses incurred for a total of \$172,216.94; and (c) final allowance of
17 compensation in the amount of \$958,029.50¹ and reimbursement of expenses in the amount of
18 \$2,710.57 for a total award of \$960,740.07 for the Employment Period. The relief requested herein
19 is based on this Application, the Declarations of Lance N. Jurich and David Corwin filed
20 concurrently herewith, and any supplemental responses or declarations which may be filed prior to
21 a hearing on this matter.
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27 ¹ These number reflect an additional voluntary reduction of \$45,000. The total fees prior to the
28 voluntary reduction (a) for the Second Interim Period were \$216,842.50 and (b) for the Employment Period
were \$1,003,029.50.

I. APPLICATION SUMMARY

For the Employment Period, Loeb seeks final allowance of compensation in the amount of \$958,029.50 and reimbursement of expenses in the amount of \$2,710.57 for a total award of \$960,740.07. Loeb has already received \$688,523.13 on account of the First Award and agreed to receive the remaining \$100,000 in installment payments.

Loeb's attorneys and paralegals billed 246.6 to this matter during the Employment Period. Of the total amount sought herein, \$171,842.50 is for services rendered and \$374.44 is for expenses incurred during the Second Interim Period. The amounts for the Second Interim Period have not been the subject of prior interim applications. As set forth below, Loeb has agreed (a) to reduce its fees for the Second Interim Period by \$45,000 to \$172,216.94, and (b) to accept payment on account of an award for the Second Interim Period in equal installments.

A. Summary of Employment Period (February 29, 2024 – March 31, 2025)

1. Total Fees for Employment Period	\$1,003,029.50
2. Total Fees Employment Period Subject to Final Approval	\$958,029.50
2. Total Expenses Subject to Final Approval	\$2,710.57
3. Total Requested	\$960,740.07
4. Total Fees Paid for First Interim Period	\$686,187.00
5. Total Expenses Paid for First Interim Period	\$2,336.13
6. Total Previously Paid	\$688,523.13
7. Total Fees Due Before Reduction	\$316,842.50
8. Total Fees Due After Reduction	\$271,842.50
9. Total Expenses Due	\$374.44
10. Total Hours Billed	1,180.2

B. Summary of Second Interim Period (November 1, 2024 – March 31, 2025)

1. Total Fees for Second Interim Period	\$216,842.50
2. Total Expenses Subject to Final Approval	\$374.44
3. Total Request Before Reduction	\$217,216.94
4. Total Request After Reduction	\$172,216.94
5. Total Fees Paid per Interim Applications	\$686,187.00
6. Total Expenses Paid per Interim Applications	\$2,336.13
7. Total Previously Paid	\$688,523.13
8. Total Due Before Reduction	\$217,216.94
9. Total Due After Reduction	\$172,216.94
10. Total Hours Billed	242.6
11. Blended Hourly Rate Including Paralegals	\$879.30
12. Blended Hourly Rate Excluding Paralegals	\$956.70

C. Compensation and Expense Reimbursement History

Loeb has filed one interim fee application in this case (the “Case”). Loeb filed its *First Interim Application for Approval of Fees and Reimbursement of Expenses for the Period of February 29, 2024 through October 31, 2024* [Docket No. 320]. Loeb was awarded, on an interim basis, \$786,187.00 for services rendered and \$2,336.13 for reasonable expenses incurred for a total of \$788,523.13 for the First Interim Period. Loeb has been paid \$688,523.13 on account of the First Award and agreed to receive the remaining \$100,000 in installment payments.

1 **D. Funds on Hand**

2 MTC has sufficient funds on hand in the estate to pay these and other professional fees.
3
4 Loeb has agreed to accept payment of the amount awarded for the Second Interim Period in equal
5 monthly installments.

6 **II. INTRODUCTION**

7 Local Bankruptcy Rule 2016-1(a)(1) sets forth certain requirements that a professional must
8 satisfy in order to obtain an award for fees and costs. Additional standards to be employed in the
9 review of fee applications are set forth in the United States Departments of Justice's Guidelines for
10 Reviewing Applications for Compensation and Reimbursement of Expenses filed under 11 U.S.C.
11 § 330.2. Section 330(a)(3) of the Bankruptcy Code directs this Court to consider "the nature, the
12 extent, and the value" of the legal services provided when determining the amount of reasonable
13 compensation to award. The Ninth Circuit's primary method used to determine the reasonableness
14 of fees is to calculate the lodestar. *In re Buckridge*, 367 B.R. 191, 201 (Bankr. C.D. Cal. 2007).
15 The lodestar is ascertained by multiplying the number of hours reasonably expended by a reasonable
16 hourly rate. *Law Offices of David A. Boone v. Derham-Burk (In re Eliapo)*, 468 F.3d 592, 598 (9th
17 Cir. 2006). This Application complies with all statutory guidelines and Court-imposed requirements
18 based upon the actual fees incurred.

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21 The Debtor commenced its bankruptcy case by filing a voluntary petition for relief under
22 chapter 11 subchapter V of the Bankruptcy Code on February 29, 2024 (the "**Petition Date**"). No
23 Creditors' Committee was appointed. By this Application, Loeb requests an order from the Court
24 (a) approving its Application seeking \$171,842.50 for services rendered and \$374.44 for reasonable
25 expenses incurred for the Second Interim Period, less a voluntary \$45,000 reduction, for a total of \$
26 172,216.94 for such period; and (b) final allowance of compensation in the amount of \$958,029.50
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1 and reimbursement of expenses in the amount of \$2,710.57, for a total award of \$960,740.07 for the
2 Employment Period.

3 This is the second application for allowance of fees filed by Loeb for work performed on
4 behalf of the Debtor. During the Second Interim Period, Loeb expended an aggregate of 246.6²
5 hours on behalf of the Debtor in this case: A summary of time expended for each category by each
6 attorney and/or paralegal working on this case and fees charged by each professional is attached
7 hereto as **Exhibit “A”**; a summary of total costs incurred is attached hereto as **Exhibit “B”**; and the
8 biographies of Lance N. Jurich and Vadim Rubinstein, the attorneys who have primary
9 responsibility for this case and other professionals who have billed time on this matter are attached
10 hereto as **Exhibit “C”**. **Exhibit “D”** consists of the actual Loeb invoices containing the detailed
11 time entries and the costs.
12

13 Pursuant to Federal Rule of Bankruptcy Procedure 2002(a)(6) and Local Bankruptcy Rule
14 2016-1(c)(3), Loeb has served notice of this Application and the amount of fees and expenses sought
15 herein upon the Office of the U.S. Trustee, the Subchapter V Trustee the Debtor twenty largest
16 creditors. Loeb also served the Application on all parties who have filed a Notice of Appearance
17 and the Debtor’s 20 largest unsecured creditors.
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19 Loeb has reviewed the requirements of Local Bankruptcy Rule 2016-(a) and (c) and submits
20 that this Application complies with such Rule.
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27 ² 250.3 is the total amount of hours Loeb professionals billed to this client and matter during the
28 Second Interim Period. Loeb wrote down 3.7 hours and capped the fees of the partners involved in the matter,
a \$46,076.50 reduction, and agreed to further reduce its fees by \$45,000. See Jurich Decl., ¶6.

1 **III. THIS APPLICATION COMPLIES WITH LOCAL BANKRUPTCY RULE 2016-1**

2 **A. Brief Narrative History of the Present Posture of the Case and Significant Events**
3 **During the Final Application Period.**

4 ***i) General Background***

5 On February 29, 2024, the Debtor filed a voluntary petition for relief under subchapter V of
6 chapter 11 of the Bankruptcy Code. On March 21, 2025, the Court entered the *Order Confirming*
7 *the Debtor's Second Modified First Amended Chapter 11 Plan* [Docket No. 399].

8 In this complicated Subchapter V bankruptcy, Loeb has worked tirelessly to reach consensus
9 with its creditor body and to keep the US Trustee and the Sub-Chapter 5 Trustee, who took active
10 roles in the case, informed and consulted. At numerous points during the case, the US Trustee
11 and/or the Subchapter V Trustee pushed back on requests made by the Debtor and/or asked for
12 additional information. The activism of these participants was likely caused, in the large part,
13 because there was no Creditors' Committee and because the case generated a good deal of local
14 press. That is not a complaint by MTC – these parties were fulfilling their statutory role and have
15 been supportive and helpful throughout the case. It is simply noted that counsel for the Debtor
16 actively kept the US Trustee, and the Subchapter V Trustee involved every step of the way as the
17 case progressed, consulted with these parties fairly regularly and worked constructively with its
18 creditors to reach consensus and avoid litigation. Moreover, Loeb was actively engaged with the
19 Debtor's major creditors, including its landlords and bank creditors, to resolve issues without need
20 for litigation.

21 All of these efforts have resulted in a consensual plan that was accepted by over 97% (in
22 both dollar amount and number voting) of the creditors who voted and confirmed by the Court.
23 Loeb respectfully submits that its legal time was eminently reasonable and has led to an outstanding
24 result for the Debtor, its employees and all of its creditors and constituents. Simply put, this
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1 successful restructuring through Subchapter V will allow this fourth-generation family business to
2 prosper over the next century with its streamlined operations and reduced obligations.

3 ***ii) History and Background of MTC's Business***

4 MTC has been owned by the Corwin family since 1923, with Toni Corwin, the widow of
5 Bruce Corwin, holding a majority interest. MTC was the dominant motion picture exhibitor in
6 downtown Los Angeles by the late 1940s. MTC's largest area of concentration is in Santa Barbara
7 County, where it has operated since 1950. MTC did not own any real property. As mentioned above,
8 MTC and its subsidiaries operated a diverse collection of historic properties and state-of-the-art
9 multiplexes among their 16 theatres and 87 screens, in California, Colorado, and Utah, which
10 include two IMAX auditoriums.

11 ***iii) Events Leading to the Bankruptcy Filing and Commencement of the Case***

12 As was the case with many movie theatres and their significant brick and mortar footprint,
13 the COVID-19 pandemic challenged the Debtor's stable business while turning the movie theatre
14 business upside down. During that period and extending into the two years that followed when in-
15 person movie going was still slow, the Debtor's monthly lease obligations and operating expenses
16 began to present a significant challenge to the Debtor's financial stability. Due to its financial
17 fragility caused by the aforementioned factors and in view of the likely decrease in box office
18 performance in 2024, which is down 20.1% year-to-date for the industry compared to 2023, the
19 Debtor lacks the liquidity necessary to continue operating in its current footprint without further
20 right-sizing the scope of its business and rejecting or modifying certain above-market leases, which
21 prompted the filing of this Subchapter V Case.
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1 *iv) Case Developments*

2 On the Petition Date, the Debtor commenced a voluntary case under chapter 11 of the
3 Bankruptcy Code as a debtor as defined in Bankruptcy Code section 1182(1) and the Debtor elected
4 to proceed under Subchapter V of chapter 11 of the Bankruptcy Code pursuant to the Small Business
5 Debtor Reorganization Act, as amended.
6

7 On March 4, 2024, the U.S. Trustee appointed M. Douglas Flahaut as the Subchapter V
8 Trustee (the “U.S. Trustee”). No other trustee, examiner, or official committee has been appointed
9 in this case. The Debtor operated its businesses as debtor in possession pursuant to sections 1107
10 and 1108 of the Bankruptcy Code.
11

12 The Court held the First Day Hearings on March 4, 2024, where the Court granted the
13 Debtor’s motions to: maintain bank accounts and use cash collateral; provide adequate assurance to
14 utility companies; pay prepetition wages; extend the Debtor’s time to file schedules and statement
15 of financial affairs; and limit notice. Shortly thereafter, the Debtor filed its motions for Orders
16 allowing the Debtor to honor gift card obligations and to pay critical vendors.
17

18 The Debtor filed its Schedules and Statement of Financial Affairs on March 21, 2024 as
19 directed by the Court and also filed its motion to assume a non-residential real property lease. The
20 Debtor attended its 341 Meeting on April 4, 2024.

21 On April 24, 2024, the Court entered its *Order Granting Application of the Debtor to Employ*
22 *Loeb & Loeb LLP as Bankruptcy Counsel Pursuant to Section 327(a) of the Bankruptcy Code and*
23 *Bankruptcy Rule 2014, Effective as of the Petition Date* [Docket No. 168].

24 On May 28, 2024, the Debtor filed its *Chapter 11 (Subchapter V) Plan of Reorganization*
25 [Docket No. 201].
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1 On July 22, 2024, the Court entered its *Scheduling Order in Connection with Subchapter V*
2 *Amended Plan of Reorganization* [Docket No. 258], which, among other things, set the hearing to
3 consider confirmation of the Plan (hereinafter defined).

4 On August 20, 2024, the Debtor filed its *First Amended Chapter 11 (Subchapter V) Plan of*
5 *Reorganization* [Docket No. 263].

6 On February 11, 2025, the Debtor filed its *Second Modified First Amended Chapter 11*
7 *(Subchapter V) Plan of Reorganization* [Docket No. 382] (as may be amended, supplemented, or
8 otherwise modified from time to time, the “**Plan**”).

9 On March 21, 2025, the Court entered its *Order Confirming the Debtor’s Second Modified*
10 *First Amended Chapter 11 (Subchapter V) Plan of Reorganization* [Docket No. 399].

11 On April 1, 2025, the Debtor filed the *Notice of (I) the Occurrence of the Effective Date with*
12 *Respect to the Plan; (II) Substantial Consummation of the Plan; (III) Bar Date for Rejection*
13 *Damages Claims; (IV) Bar Date for Unapproved Professional Fee Administrative Claims; and (V)*
14 *Bar Date for Administrative Rent Claims* [Docket No. 406].

15 **B. Fees and Expenses Previously Requested.**

16 On November 19, 2024, the Debtor filed its *First Interim Application for Approval of Fees*
17 *and Reimbursement of Expenses for the Period of February 29, 2024 through October 31, 2024*
18 [Docket No. 320].

19 On December 19, 2024, the Court entered its *Order Granting First Interim Application of*
20 *Loeb & Loeb LLP, Counsel to the Debtor for Approval of Fees and Reimbursement of Expenses for*
21 *the Period of February 29, 2024 through October 31, 2024* [Docket No. 365].

22 To date, the Debtor has paid \$688,523.13 of the outstanding fees and expenses. Loeb has
23 agreed for the Debtor to pay the remaining \$100,000.00 of the outstanding fees and expenses in
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1 monthly installments of \$16,667.00 beginning July 1, 2025. As set forth in the First Fee Application,
2 Loeb agreed to discount its fees and expenses for the First Interim Period in the amount of \$73,224.

3 **C. Brief Narrative Statement of Services Rendered and Time Expended, Fees Charged**
4 **for Each Category and Benefits to the Estate During the Second Interim Period.**

5 During the Second Interim Period, Loeb expended an aggregate of 246.5 hours on behalf of
6 the Debtor in this case. A summary of time expended by each attorney and/or paralegal working on
7 this case and fees charged by each professional is attached hereto as **Exhibit “A”**. Pursuant to the
8 Retention Agreement, Loeb capped Lance N. Jurich’s and Vadim J. Rubinstein’s hourly rates at
9 \$1,000.00 per hour, which is over 25% lower than the currently charged rates for both partners in
10 other similar matters, which resulted in a \$46,076. Deduction. Loeb further deducted \$2,740.50 in
11 legal fees of the total professional time incurred, plus an additional voluntary reduction of \$45,000
12 in fees. Furthermore, went taking into account the voluntary reductions for the First Interim Period,
13 Loeb has effectively granted a discount of over 20% for the Employment Period (Declaration of
14 Lance N. Jurich (“**Jurich Decl.**”), ¶¶ 5 and 6.) A summary of total costs incurred during the Second
15 Interim Period is attached hereto as **Exhibit “B”**. The biographies of the attorneys who have
16 primary responsibility for this case, Lance N. Jurich and Vadim J. Rubinstein, and other
17 professionals who have billed time on this matter are attached hereto as **Exhibit “C”**.

20 **IV. DESCRIPTION OF FEES INCURRED BY LOEB DURING THE SECOND**
21 **INTERIM PERIOD**

22 A detailed description of all professional services rendered by Loeb to the Debtor and costs
23 incurred during the Second Interim Period is set forth in the Loeb invoices attached hereto as
24 **Exhibit “D”**. A summary of the services provided by each professional is as follows:

25 **A. Case Administration (Category B110)**

26 This Matter Category includes time spent by Loeb attorneys and paraprofessionals during
27 the Second Interim Period providing services with respect to various miscellaneous matters pertinent
28

1 to the case, such as communicating with the U.S. and the Subchapter V Trustee preparing and filing
2 status reports, tending to certificates of service and other documents to assist Debtor in managing
3 the case as well as specific pending issues, including those related to insider compensation.

4 Total Hours: 1.4

Total Fees: \$744.50

5
6 **B. Plan Preparation (Category B113)**

7 This Matter Category includes time spent by Loeb attorneys and paraprofessionals during
8 the Second Interim Period providing services with respect to the Plan. Specifically, Loeb researched
9 issues related to resolicitation of the Plan. This Matter Category overlaps with Matter Category
10 B320, Plan and Disclosure Statement.

11 Total Hours: 0.8

Total Fees: \$600.00

12
13 **C. Negotiation with Landlords (Category B114)**

14 This Matter Category includes time spent by Loeb attorneys and paraprofessionals during
15 the Second Interim Period providing services with respect to lease negotiations with various
16 landlords. Specifically, Loeb corresponded and negotiated with various landlords and analyzed
17 issues related to the rejection and assumption of leases. Time charged to B185
18 (Assumption/Rejection of leases) overlaps with this category.

19 Total Hours: 5.1

Total Fees: \$5,100.00

20
21 **D. Asset Analysis and Recovery (Category B120)**

22 This Matter Category includes time spent by Loeb attorneys and paraprofessionals during
23 the Second Interim Period providing services with respect to preparing the Debtor-in-possession
24 financing and related motions.

25 Total Hours: 1.8

Total Fees: \$810.00

1 **E. Meetings and Communications with Creditors (Category B150)**

2 This Matter Category includes time spent by Loeb attorneys and paraprofessionals during
3 the Second Interim Period providing services with respect to meetings and communications with
4 creditors. Specifically, Loeb communicated and negotiated with creditors in connection with
5 executory contracts and leases, Plan issues, monthly operating reports, and creditor objections.
6

7 Total Hours: 6.4

Total Fees: \$6,400.00

8 **F. Fee/Employment Applications (Category B160)**

9 This Matter Category includes time spent by Loeb attorneys and paraprofessionals during
10 the Second Interim Period providing services with respect to the retention and fee applications of
11 Loeb and the Debtor's other professionals. Specifically, Loeb prepared and filed its fee application.
12 Loeb also prepared fee applications for Glassratner Advisory & Capital Group, LLC dba B. Riley
13 Advisory Services as Financial Advisor to the Debtor; Reicker, Pfau, Pyle & McRoy, LLP,
14 Collections and Labor Counsel to the Debtor; and Rose Snyder & Jacobs, LLP, Tax Accountant to
15 the Debtor. Loeb also prepared for and attended fee application hearings.
16

17 Total Hours: 61.7

Total Fees: \$47,224.00

18 **G. Fee/Employment Objections (Category B170)**

19 This Matter Category includes time spent by Loeb attorneys and paraprofessionals during
20 the Second Interim Period providing services with respect to communications with the U.S. Trustee.
21 Specifically, Loeb communicated with the U.S. Trustee regarding fee applications and electronic
22 records.
23

24 Total Hours: 1.5

Total Fees: \$1,500.00

25 **H. Assumption/Rejection of Lease/Contracts (Category B185)**

26 This Matter Category includes time spent by Loeb attorneys and paraprofessionals during
27 the Second Interim Period providing services with respect to the assumption and rejection of
28

1 executory contracts and leases. Loeb also billed time to this Matter Category for negotiating with
2 various contract counterparties. This Matter Category overlaps with Matter Category B114,
3 negotiation with landlords.

4 Total Hours: 14.7

Total Fees: \$14,700.00

5
6 **I. Other Contested Matters (Category B190)**

7 This Matter Category includes time spent by Loeb attorneys and paraprofessionals during
8 the Second Interim Period providing services with respect to contested matters that were not
9 captured by the other Matter Categories. Specifically, Loeb corresponded and conferenced with
10 creditors and the U.S. Trustee regarding certain contested matters, including a stipulation and notice
11 of lodgment.

12 Total Hours: 10.4

Total Fees: \$4,680.00

13
14 **J. Business Operations (Category B210)**

15 This Matter Category includes time spent by Loeb attorneys and paraprofessionals during
16 the Second Interim Period providing services with respect to business operations. Specifically, Loeb
17 addressed numerous issues pertaining to the Debtor's financial and business operations. This Matter
18 Category also captures time for work on monthly operating reports and providing information to the
19 U.S. Trustee regarding the Debtor's financial business operations. Loeb also worked on corporate
20 documents related to the bankruptcy and corresponded with the Debtor regarding its finance and
21 business operations, insurance, and budget.

22
23 Total Hours: 5.5

Total Fees: \$5,500.00

24 **K. Financing Cash Collections (Category B230)**

25 This Matter Category includes time spent by Loeb attorneys and paraprofessionals during
26 the Second Interim Period providing services with respect to DIP financing. Specifically, Loeb
27
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1 drafted pleadings related to DIP financing and prepared for and attended a hearing regarding the
2 same.

3 Total Hours: 5.9

Total Fees: \$5,900.00

4 **L. Claims Administration and Objections (Category B310)**

5 This Matter Category includes time spent by Loeb attorneys and paraprofessionals during
6 the Second Interim Period providing services with respect to the administration of claims and related
7 objections. Specifically, Loeb assessed addressed issues related to administrative claims and
8 communicated with creditors and the Debtor regarding the same.

9
10 Total Hours: 0.7

Total Fees: \$700.00

11 **M. Plan and Disclosure Statement (Category B320)**

12 This Matter Category includes time spent by Loeb attorneys and paraprofessionals during
13 the Second Interim Period providing services with respect to the Plan. Specifically, Loeb prepared
14 and filed revised versions the Plan and also drafted and revised the Plan implementation documents,
15 including the confirmation brief and related declarations, confirmation order, supplemental filings
16 and prepared for and attended hearings and status conferences with respect to the Plan. Further,
17 Loeb researched and analyzed issues relating to plan confirmation and execution. Loeb also
18 reviewed and engaged in calls regarding loan and financing issues and projections. Loeb also
19 communicated with the Debtor, U.S. Trustee, and others regarding the Plan and related objections
20 and issues.

21
22 Total Hours: 130.6

Total Fees: \$122,984.00

23
24 **V. DESCRIPTION OF COSTS INCURRED BY**
25 **LOEB DURING THE SECOND INTERIM PERIOD**

26 During the Second Interim Period, Loeb advanced funds for costs for which reimbursement
27 is now sought by this Application. A summary of the costs advanced by Loeb is set forth in **Exhibit**
28 **“B”**. A detailed statement of the costs advanced by Loeb during the Second Interim Period are

1 itemized in Loeb's invoices attached as **Exhibit "D"**. This includes Loeb's expenses incurred in
2 photocopying, making long distance telephone calls, telecopying, mailing, and hiring messenger
3 services. Loeb generally handles regular and routine photocopying in-house for which Loeb charges
4 clients twenty cents (\$.20) per page. Loeb's photocopy machines automatically record the number
5 of copies made when the person that is photocopying enters the client's account number into a
6 device attached to the photocopy machine. Whenever feasible, Loeb sends large copying projects
7 to outside copy services that charge bulk rates for photocopying. In such instances, Loeb charges
8 clients the same amount that Loeb pays the outside service.

10 All expenses that Loeb advanced on behalf of the Debtor were necessarily incurred and are
11 properly charged as administrative expenses of the Debtor's chapter 11 estate.

12 VI. STANDARD OF LAW

13
14 Prior to the enactment of the Bankruptcy Code, the rule with respect to compensation
15 requests in the Ninth Circuit was that the Bankruptcy Court should award attorneys' fees in
16 accordance with a "strict rule of economy test." *In re THC Financial Corp.*, 659 F.2d 951, 955 n.2
17 (9th Cir. 1981), *cert. denied*, 456 U.S. 977 (1982). This is no longer the law. The legislative history
18 to Section 330 of the Bankruptcy Code indicates that Congress was primarily concerned with
19 protecting the public interest in the smooth, efficient operation of the bankruptcy system by
20 encouraging competent bankruptcy specialists to remain in the field. *First National Bank of*
21 *Chicago v. Committee of Creditors Holding Unsecured Claims (In re Powerline Oil Co.)*, 71 B.R.
22 767, 770 (Bankr. 9th Cir. 1986); *In re Baldwin-United Corp.*, 79 B.R. 321, 346 (Bankr. S.D. Ohio
23 1987). Toward this end, Congress specifically disavowed notions of economy of administration,
24 and provided that compensation in bankruptcy cases should be comparable to what is charged in
25 nonbankruptcy matters. *Id.* at 346.
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Under the lodestar approach, the Court is to determine the number of hours reasonably expended in an attorney's representation of a debtor and multiply such number by a reasonable hourly rate for the services performed. *See, Pennsylvania v. Delaware Valley Citizens' Council for Clear Air*, 478 U.S. 546, 565 (1986); *In re Powerline Oil Co.*, 71 B.R. 770. A reasonable hourly rate is presumptively the rate the marketplace pays for the services rendered. *Missouri v. Jenkins*, 491 U.S. 274, 109 S. Ct. 2463, 2469 (1989); *Burgess v. Klenske (In re Manoa Finance Co., Inc.)*, 853 F.2d 687, 691 (9th Cir. 1988). Recognizing that the determination of an appropriate "market rate" for the services of a lawyer is inherently difficult, the Supreme Court stated:

Market prices of commodities and most services are determined by supply and demand. In this traditional sense there is no such thing as a prevailing market rate for the service of lawyers in a particular community. The type of services rendered by lawyers, as well as its experience, skill, and reputation, varies extensively -- even within a law firm. Accordingly, the hourly rates of lawyers in private practice also vary widely. The fees charged often are based on the product of hours devoted to the representation multiplied by the lawyer's customary rate.

Blum v. Stenson, 465 U.S. 886, 895 n.11 (1984). The Supreme Court has stated that a reasonable attorney's fee "means a fee that would have been deemed reasonable if billed to affluent plaintiffs by their own attorneys." *Riverside v. Rivera*, 477 U.S. 561, 591 (1986) (Rehnquist, J. dissenting). Accordingly, a reasonable hourly rate is the hourly amount to which attorneys in the area with comparable skill, experience and reputation typically would be entitled as compensation. *Blum*, 465 U.S. at 895 n.11.

Loeb respectfully submits that the hourly rates for its attorneys and paraprofessionals are reasonable and are billed at rates in accordance with the practices employed by Loeb. (Jurich Decl., ¶ 6.) Indeed, Loeb discounted by approximately 25% the current hourly rates of the Loeb partners handling this matter, Lance Jurich and Vadim Rubinstein. The Debtor selected Loeb as its bankruptcy counsel because of the Debtor's confidence in Loeb's ability to successfully deal with issues related to the Debtor's financial and business affairs.

1 The expenses for which Loeb requests reimbursement are within the guidelines promulgated
2 by the U.S. Trustee and the Central District of California.

3 The myriad of complex issues which arose throughout the case required the expertise of a
4 firm like Loeb. The services and expenses for which compensation is requested in this Application
5 were performed or incurred by Loeb on behalf of or in connection with Loeb's representation of the
6 Debtor and not on behalf of any other entity or individual. There is no agreement or understanding
7 between Loeb and any other person, firm or entity for the division or sharing of compensation in
8 this case, which is in violation of the Bankruptcy Code and Rules of this Court. Moreover, (a) Loeb
9 voluntarily wrote off more than \$73,224 of its time during the First Interim Period, (b) has agreed
10 to write off an additional \$46,076.50 for the Second Interim Period, (c) has agreed to write off an
11 additional \$45,000 for the Employment Period, (d) has agreed to accept payment in installments of
12 \$16,667.00 beginning July 1, 2025 for the \$100,000 remaining of the First Award and (e) has agreed
13 to accept payment in installments of \$7,435.11 beginning January 1, 2026 for the \$66,916 in fees
14 for the Second Interim Period.

15 Loeb respectfully submits that the foregoing establishes that Loeb's fees and expenses are
16 reasonable.

17 **VII. CLIENT APPROVAL OF THE APPLICATION**

18 David Corwin, the president of the Debtor, has been provided with a copy of this Application
19 and, as set forth in his declaration submitted pursuant to Local Bankruptcy Rule 2016-1(J), has
20 approved it.
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VIII. CONCLUSION

WHEREFORE, Loeb respectfully requests that this Court enter an order:

1. Approving on a final basis for the Second Interim Period the amount of \$171,842.50, representing a \$45,000 voluntary reduction from \$216,842.50, for services rendered and reimbursement of actual necessary costs during this period of \$374.44, totaling \$172,216.94 for fees and expenses incurred;
2. Approving on a final basis compensation in the amount of \$958,029.50 and reimbursement of expenses in the amount of \$2,710.57, for a total award of \$960,740.07 for the entire Employment Period;
3. Directing payment of such fees and expenses; and
4. Granting such other and further relief as the Court deems just and proper.

Dated: May 1, 2025

LOEB & LOEB LLP
LANCE N. JURICH
VADIM J. RUBINSTEIN

By: /s/Lance N. Jurich
Lance N. Jurich

Attorneys for Metropolitan Theatres Corporation

SUMMARY BY PROFESSIONAL				
Full Name	Hourly Rates	Hourly Rates (Per Engagement)	Total Hours Spent by Professional	Total Fees (Hourly Rates Per Engagement)
Lance N. Jurich (Partner)	\$1,175.00	\$1,000.00	45.8	\$45,800.00
Vadim Rubinstein (Partner)	\$1,185.00	\$1,000.00	135.2	\$135,200.00
Alexis Zobeideh (Associate)	\$670.00	\$670.00	26.7	\$17,889.00
Alexis Zobeideh (Associate)	\$750.00	\$750.00	0.8	\$600.00
Fiona McKeown (Paralegal)	\$450.00	\$450.00	24.2	\$10,890.00
Fiona McKeown (Paralegal)	\$465.00	\$465.00	13.9	\$6,463.50
			Total Hours: 246.6	Total Fees: \$216,842.50

SUMMARY BY TASK CODE				
Full Name	Hourly Rates	Hourly Rates (Per Engagement)	Total Hours Spent by Professional	Fee (Hourly Rates Per Engagement)
Case Administration (Category B110)				
Vadim Rubinstein (Partner)	\$1,185.00	\$1,000.00	0.2	\$200.00
Fiona McKeown (Paralegal)	\$450.00	\$450.00	1.2	\$544.50
			Total Category Hours: 1.4	Total Fees: \$744.50
Plan Preparation (Category B113)				
Alexis Zobeideh (Associate)	\$750.00	\$750.00	0.8	\$600.00
			Total Category Hours: 0.8	Total Fees: \$600.00
Negotiation with Landlords (Category B114)				
Lance N. Jurich (Partner)	\$1,175.00	\$1,000.00	0.3	\$300.00
Vadim Rubinstein (Partner)	\$1,185.00	\$1,000.00	4.8	\$4,800.00
			Total Category Hours: 5.1	Total Fees: \$5,100.00
Asset Analysis and Recovery (Category B120)				
Fiona McKeown (Paralegal)	\$450.00	\$450.00	1.8	\$810.00
			Total Category Hours: 1.8	Total Fees: \$810.00
Meetings and Communications with Creditors (Category B150)				
Lance N. Jurich (Partner)	\$1,175.00	\$1,000.00	0.5	\$500.00
Vadim Rubinstein (Partner)	\$1,185.00	\$1,000.00	5.9	\$5,900.00
			Total Category Hours: 6.4	Total Fees: \$6,400.00

Fee/Employment Applications (Category B160)				
Lance N. Jurich (Partner)	\$1,175.00	\$1,000.00	10.8	\$10,800.00
Vadim Rubinstein (Partner)	\$1,185.00	\$1,000.00	13.9	\$13,900.00
Alexis Zobeideh (Associate)	\$670.00	\$670.00	26.7	\$17,889.00
Fiona McKeown (Paralegal)	\$430.00	\$387.00	10.3	\$4,635.00
			Total Category Hours: 61.7	Total Fees: \$47,224.00
Fee/Employment Objections (Category B170)				
Lance N. Jurich (Partner)	\$1,175.00	\$1,000.00	0.6	\$600.00
Vadim Rubinstein (Partner)	\$1,185.00	\$1,000.00	0.9	\$900.00
			Total Category Hours: 1.5	Total Fees: \$1,500.00
Assumption/Rejection of Lease Contracts (Category B185)				
Lance N. Jurich (Partner)	\$1,175.00	\$1,000.00	5.5	\$5,500.00
Vadim Rubinstein (Partner)	\$1,185.00	\$1,000.00	9.2	\$9,200.00
			Total Category Hours: 14.7	Total Fees: \$14,700.00
Other Contested Matters (Category B190)				
Fiona McKeown (Paralegal)	\$450.00	\$450.00	10.4	\$4,680.00
			Total Category Hours: 10.4	Total Fees: \$4,680.00
Business Operations (Category B210)				
Lance N. Jurich (Partner)	\$1,175.00	\$1,000.00	0.2	\$200.00
Vadim Rubinstein (Partner)	\$1,185.00	\$1,000.00	5.3	\$5,300.00
			Total Category Hours: 5.5	Total Fees: \$5,500.00

Financing Cash Collections (Category B230)				
Lance N. Jurich (Partner)	\$1,175.00	\$1,000.00	0.8	\$800.00
Vadim Rubinstein (Partner)	\$1,185.00	\$1,000.00	5.1	\$5,100.00
			Total Category Hours: 5.9	Total Fees: \$5,900.00
Claims Administration and Objections (Category B310)				
Lance N. Jurich (Partner)	\$1,175.00	\$1,000.00	0.3	\$300.00
Vadim Rubinstein (Partner)	\$1,185.00	\$1,000.00	0.4	\$400.00
			Total Category Hours: 0.7	Total Fees: \$700.00
Plan and Disclosure Statement (Category B320)				
Lance N. Jurich (Partner)	\$1,175.00	\$1,000.00	26.8	\$26,800.00
Vadim Rubinstein (Partner)	\$1,185.00	\$1,000.00	89.5	\$89,500.00
Fiona McKeown (Paralegal)	\$450.00	\$450.00	0.8	\$360.00
Fiona McKeown (Paralegal)	\$465.00	\$465.00	13.6	\$6,324.00
			Total Category Hours: 130.7	Total Fees: \$122,984.00
TOTALS:			246.6	\$216,842.50

<u>Cost Summary</u>		
<i>Costs from November 1, 2024 to March 31, 2025</i>		
Cost Code Description		Cost Bill Amount
DELIVERY SERVICES/MESSENGERS		\$100.70
LOCAL TRAVEL		\$10.00
ONLINE RESEARCH		\$37.20
OUTSIDE COPYING		\$183.27
SERVICE FEE		\$43.27
Total:		\$374.44



Lance Jurich

Chair, Restructuring & Bankruptcy

Los Angeles

ljurich@loeb.com

T: +1 310-282-2211

Lance Jurich, a partner in Loeb & Loeb's Bankruptcy, Restructuring and Creditors' Rights Practice Group in its Los Angeles office, serves as a trusted advisor to many clients. He is a commercial litigator who specializes in business bankruptcies, restructurings and the enforcement of creditors' rights. Lance has broad experience representing financial institutions and handles complex matters for these clients. He also represents fiduciaries, including receivers, assignees for the benefit of creditors, and trustees in all types of forums.

Lance's depth of experience includes bankruptcy and creditors' rights; real estate disputes; Ponzi scheme litigation; preference and fraudulent transfer litigation; partnership disputes; Chapter 11 plan issues; 363 purchases of assets; interest rate disputes; valuation disputes; assignments for the benefit of creditors ("ABC's"); lender liability cases; prejudgment remedies; guarantor litigation; receiverships; and bankruptcy appellate litigation.

Lance's practice covers a broad spectrum of complex insolvency issues for clients in diverse industries, including real estate, entertainment, healthcare, hotel and gaming, agricultural, and oil and gas. He represents domestic and international banks, insurance companies, indenture trustees, hedge funds, private equity groups, distressed debt investors, trade creditors, strategic purchasers of assets in bankruptcies, entertainment companies, real estate developers, receivers/court fiduciaries, hospitals/health care providers, and agricultural lenders and agribusinesses.

EXPERIENCE

- Represented Jessup University in acquiring substantially all of the assets and assuming specified liabilities of Multnomah University and entering into a teach-out agreement with Multnomah University.
- Represented Webb Investments Co., LLC in its purchase of substantially all the assets and operations of Silver Creek Industries LLC and two of its affiliates relating to the manufacture and construction of modular buildings for schools and other educational institutions.
- Represents financial institutions as secured creditors in the Valley Economic Development Corporation bankruptcy.
- Counsel to C&J Energy Services, a leading provider of well construction, well completion, well support and other oilfield services in its chapter 11 cases. The plan, which was confirmed in just six months, discharged \$1.4 billion in prepetition debt. Postconfirmation, acted as lead counsel on successful claim resolution process involving approximately 5,000 claims,

My Services

Restructuring & Bankruptcy
Litigation
Banking & Finance

Education

Arizona State University, B.S.
Boston University School of Law,
J.D.

Bar Jurisdictions

California

Court Admissions

California State Supreme Court
U.S. Court of Appeals, Ninth
Circuit
U.S. District Court for the Central
District of California
U.S. District Court for the Eastern
District of California
U.S. District Court for the Eastern
District of California
U.S. District Court for the Northern
District of California
U.S. District Court for the Southern
District of California

discharge enforcement efforts and other steps to position the company for post-emergence success.

- Represented affiliates of Canyon Capital as holder of senior secured debt and a majority of unsecured note debt in the Hooters Casino and Hotel chapter 11 case. Overcame effort by the company's insiders to reorganize the company for their benefit, and instead achieved a sale process at which Canyon became the successful bidder and acquired the property. Defeated attempt by insiders, under a newly-enacted Nevada statute, to reduce the amount of the client's claims to the amount paid for those claims in the secondary market (substantially less than par), thus creating favorable new law for distressed debt investors in Nevada.
- Bankruptcy co-counsel to C&J Energy Services Ltd. in a voluntary reorganization under Chapter 11 of the U.S. Bankruptcy Code.
- Represented a cutting edge video esports platform operator, as debtor, in a high-speed Chapter 11 bankruptcy case. Loeb handled all aspects of the company's reorganization, including negotiating a DIP credit facility and guiding the debtor through confirmation of its plan of reorganization. The plan -- which was confirmed just approximately four months after the bankruptcy filing -- successfully wiped away all of the company's existing equity and recapitalized the company through a re-issuance of new stock to its creditors. Additionally, the plan also facilitated a consolidation with online gaming community Victorious Gaming and granted equity to Fuel Technologies, a global creative agency helping develop the gaming platform.
- Representing several creditors and financial institutions in the Chapter 11 bankruptcy of Relativity Media and its affiliates.
- Obtain writs of attachment and take other prejudgment enforcement actions in connection with the enforcement of credit facilities and guarantees.
- Represented crop lender and packaging claimants in agricultural bankruptcies and out-of-court restructurings.
- Represented artist/songwriter in overturning bankruptcy court confirmation order. Bankruptcy Appellate Panel and the Ninth Circuit reversed the order confirming the Chapter 11 bankruptcy plan.
- Represented a Chinese company in the Delaware bankruptcy auction of the special effects and production house Digital Domain. Successfully negotiated the purchase of a desirable film project out of the bankruptcy.
- Represented secured lender in bankruptcy filed by developer in connection with secured claim and sale of iconic condominium project located near "L.A. Live" in downtown Los Angeles.
- Represented secured creditor in connection with its multi-million dollar secured real estate claim.
- Represented syndicate of lenders in opposition to debtor's cramdown plan on a 300-unit, extended-stay hotel in Nevada. Defeated debtor's plan after a two-day confirmation trial.
- Represented insurance company and special servicer in defending a fraudulent transfer action brought by bankruptcy court trustee to recover multi-million dollar transfers made to the lender and the loan servicer.
- Represented institutional lender in litigation regarding enforceability of early pre-payment penalty charge challenged by borrower. Borrower ultimately dismissed all challenges to applicable contract clause.

- Represented hedge fund in the workout of a distressed debt secured by, among other things, the rights to "Star Trek (The Tour)." Handled the foreclosure and workout of the secured loan.
- In the Franchise Pictures bankruptcy, represented several creditors, including Gaga Communications, one of Japan's largest film distributors.
- Represented several entertainment payroll companies in connection with their claims.
- Represented institutional lender in the exercise of its rights under a defaulted credit facility by foreclosing on a film library, and negotiated and closed the immediate resale of the library for \$50 million. Also, he has represented numerous entertainment lenders and foreclosed on more than 1,000 film and television properties.
- Represented creditors and hospitals in connection with numerous bankruptcies.
- Represented secured lender in pre-bankruptcy restructuring and subsequent foreclosure of 90,000-acre mine in the Holbrook Basin of Arizona (purportedly one of the largest foreclosures in Arizona history).
- Represented major investment banks in connection with repurchase agreements, warehouse financings and investments in numerous mortgage companies, including Ownit Mortgage Solutions, American Home Mortgage, Mortgage Lenders Network, Aegis Mortgage Corporation, First Magnus Financial and ResMAE Mortgage Corporation.
- Represented unsecured creditors' committee in connection with a joint plan submitted with debtor. Joint plan was confirmed.
- Represented chairman of creditors' committee and his family in connection with fraudulent transfer claims brought by the bankruptcy trustee in connection with Ponzi scheme.
- Represented financial institution in its appeal of a bankruptcy court order. Obtained complete reversal of the bankruptcy court order by the district court. The case was appealed to the Ninth Circuit.
- Represented court-appointed receivers in FTC and SEC matters.
- Represented secured lender in connection with out-of-court restructuring of a Northern California winery.
- Represented off-shore Chinese investor in purchase and enforcement of promissory note secured by California real estate (mixed use hotel and shopping center). Represented client in connection with bankruptcy litigation against borrower and obtained multi-million judgment against guarantor. After prevailing at every level, our client obtained ownership of hotel and shopping center through foreclosure.
- Represented senior entertainment lender in enforcement and collection efforts against foreign film distributors.

RECOGNITION & AFFILIATIONS

Recognition

- Named "Southern California Super Lawyer" in Bankruptcy & Creditor/Debtor Rights by Thomson Reuters (2005-2025)

- Highest "AV Preeminent (5 out of 5)" Professional Rating, *Martindale-Hubbell Law Directory*
- Named "Best Lawyer" in Bankruptcy & Creditor Debtor Rights and Bankruptcy Litigation, *The Best Lawyers in America*, published by Woodward White, Inc (2016-2025)

Affiliations

- Member, Special Assets Management Association (SAMA)
- Member, California Bankruptcy Forum
- Editor, *California Bankruptcy Journal* (2005-present)
- Advisory Planning Board, Annual Southwest Bankruptcy Conference, Las Vegas American Bankruptcy Institute; Advisory Planning Board, Annual "Bankruptcy Battleground West," Los Angeles

PUBLICATIONS

- Co-author, No Free Pass on Transfer Liability; Good Faith Defense Alive and Well: The Pros and Cons of *Gredd v. Bear, Stearns Securities Corp.* for Prime Brokers, *California Bankruptcy Journal*, Vol. 29, No. 4 (2008)
- Co-author, Deepening Insolvency: A Doctrine in Decline?, *California Bankruptcy Journal*, Vol. 29, No. 2 (2007)

MEDIA MENTIONS

- SSG Advises The Paper Store in the Sale of Substantially all of its Assets to TPS Group Holdings, LLC, *Secured Finance Network* (June 7, 2021)
- How Rich Chinese Use Visa Fixers to Move to the U.S., *Bloomberg Businessweek* (September 14, 2017)
- Hooters Casino Hotel Lender to Bid \$60M at Auction, *Law360* (February 6, 2012)
- Principal Creditor Will Bid \$60 Million for Hooters Hotel, *Las Vegas Review-Journal* (January 18, 2012)
- New Yorker Films Closes, *Video Business* (February 23, 2009)

EVENTS

- Speaker, American Bankruptcy Institute (ABI) 2019 Bankruptcy Battleground West (March 28, 2019)
- Speaker, The Brewing Storm of EB-5 Defaults: Navigating the Workouts of EB-5 Loans (February 14, 2017)
- Speaker, UCLA Entertainment Symposium (March 11-12, 2016)
- Speaker, Loeb & Loeb IP/Entertainment Law Conference (September 17, 2015)
- Speaker, 4th Annual SAMA Conference, Ojai, California (May 2014)

- Speaker, American Bankruptcy Institute Bankruptcy Battleground West Conference (March 4, 2011)



Vadim J. Rubinstein

Deputy Chair, Restructuring & Bankruptcy

New York

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T: +1.212.407.4092

Vadim Rubinstein leads a bankruptcy practice with a broad range of experience in both the transactional and litigation aspects of bankruptcy cases and out-of-court workouts. He has advised clients in the insolvency and bankruptcy context across a wide range of industries, including real estate, entertainment, energy, aviation, manufacturing, technology, retail, telecommunications, pharmaceuticals and trucking.

Vadim has represented debtors, official unsecured creditors' committees, creditor committee members, secured lenders, public bondholders, investors, strategic purchasers, trade creditors, landlords, title companies and trustees in complex business reorganizations, out-of-court restructurings, financial transactions and litigation.

Vadim regularly represents indenture trustees and administrative agents in numerous significant bankruptcy cases throughout the country, including the bankruptcy cases of GT Advanced Technologies, Armstrong Energy, Ion Media, Residential Capital, Washington Mutual and Forbes Energy, among others.

He frequently counsels clients in the areas of corporate reorganization and restructuring, creditors' rights, distressed acquisitions, debtor-in-possession financing and pre-bankruptcy planning. He possesses substantial experience in the areas of Chapter 11 plan negotiation and confirmation, as well as all aspects of litigation in Chapter 11 cases.

As a member of the firm's Real Estate Finance Group, Vadim regularly issues legal opinions related to commercial lending transactions, including non-consolidation, true sale, safe harbors and authority to file opinions.

My Services

Restructuring & Bankruptcy
Real Estate Finance

Education

University of Pittsburgh School of Law, J.D., Staff Member, *Journal of Law and Commerce*; Lead Editor, Notes and Comments
Cornell University, B.S.

Bar Jurisdictions

New York

Court Admissions

U.S. District Court for the Eastern District of New York
U.S. District Court for the Southern District of New York

Languages

Russian

RECOGNITION & AFFILIATION

Affiliations

- Member, American Bankruptcy Institute

PUBLICATIONS

- Co-author, Case Study: In Re Lower Bucks Hospital, Law360 (June 13, 2012)
- Co-author, The Case for Congressional Intervention to Amend the Examiner Statute, Bloomberg Law Reports (September 27, 2010)

- Co-author, Mortgage Repo Redux: Will the Code's Broadened Protections Be Broad Enough?, *Financier Worldwide* (April 2007)

MEDIA MENTIONS

- SSG Advises The Paper Store in the Sale of Substantially all of its Assets to TPS Group Holdings, LLC, *Secured Finance Network* (June 7, 2021)

EVENTS

- Speaker, Retail Law Conference 2020 (October 20-22, 2020)

Alexis Zobeideh

Associate

New York

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T: +1.212.407.4027

Alexis Zobeideh focuses her practice on bankruptcy, insolvency and restructuring matters, as well as bankruptcy litigation. She represents debtors, lenders, independent directors, secured and unsecured creditors, and other parties in Chapter 11, Chapter 7 and Chapter 15 bankruptcy proceedings, as well as in out-of-court restructurings, commercial insolvencies, liquidations and assignments for the benefit of creditors.

My Services

Restructuring & Bankruptcy
Bankruptcy Litigation
Distressed Asset Sales,
Acquisitions & Investments

Education

St. John's University School of
Law, J.D., *Dean's List*, *Executive
Research Editor*, American
Bankruptcy Institute Law Review
Fordham University, B.A.

Bar Jurisdictions

New York

Languages

Czech
Spanish



Fiona P. McKeown

Paralegal

Los Angeles

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Fiona McKeown is part of the firm's Litigation practice, providing key support on large, complex cases as well as assisting with discovery and trial preparation. Fiona's experience also includes bankruptcy, family, business, criminal, real estate and contract law.

My Services

Litigation
Consumer Class Action &
Regulatory Defense
Bankruptcy Litigation
Restructuring & Bankruptcy

Education

University of Ulster



10100 SANTA MONICA BLVD
SUITE 2200
LOS ANGELES, CA 90067
(310) 282-2000 IRS #95-1780806

DECEMBER 12, 2024
INVOICE NO. 2550182

METROPOLITAN THEATRES CORPORATION
ATTENTION: DAVID CORWIN
17101 VALLEY VIEW AVE
CERRITOS, CA 90703

PAYMENT DUE UPON RECEIPT

RE: METROPOLITAN THEATERS BANKRUPTCY
OUR FILE NO: 236362-10002

FEES FOR PROFESSIONAL SERVICES RENDERED AS PER ATTACHED DETAIL	72,877.00
TOTAL CURRENT AMOUNT DUE	72,877.00
OTHER OUTSTANDING INVOICES (PER ATTACHED DETAIL)	788,523.13
TOTAL AMOUNT DUE	861,400.13

PAYMENT OPTIONS

Payment by wire or ACH, please use the following:

City National Bank
2029 Century Park East
Los Angeles, CA 90067

ABA: 122016066
Account no: 210-034722
Beneficiary: Loeb & Loeb LLP – General Account
SWIFT Code: CINAUS6L

Payment by check, please remit to:

Loeb & Loeb LLP
10100 Santa Monica Blvd
Suite 2200
Los Angeles, CA 90067

** Please include as a reference client no: 236362 or invoice number 2550182
To aid in application of the payment, details should be sent to epayment@loeb.com

If our account details change, we will notify these to you by letter, phone or face-to-face and never by email.

MATTER # 236362-10002
 INVOICE # 2550182

METROPOLITAN THEATRE CORPORATION
 METROPOLITAN THEATERS BANKRUPTCY

12/12/24
 Page: 2

Date	TK	Description of Services Rendered	Hours
B110 CASE ADMINISTRATION			
11/27/24	VJR	TEND TO CERTIFICATES OF SERVIES AND FILINGS.	0.20
Subtotal B110 CASE ADMINISTRATION			0.20 200.00
B114 NEGOTIATION WITH LANDLORDS			
11/05/24	LNJ	ENGAGED AS TO OFFICE LEASE ISSUES.	0.10
11/25/24	VJR	TEND TO EMAIL TO LEW LANDAU.	0.10
Subtotal B114 NEGOTIATION WITH LANDLORDS			0.20 200.00
B120 ASSET ANALYSIS AND RECOVERY			
11/01/24	F M	PREPARE HEARING NOTICE(.6); FINALIZE FREEMAN DECLARATION (.2); FINALIZE CORWIN DECLARATION (.2); FINALIZE DIP MOTION (.3); FINALIZE MOTION TO SHORTEN TIME (.1); PHONE CALLS WITH CLERK (.1)	1.50
11/04/24	F M	FINALIZE CERTIFICATE OF SERVICE	0.10
11/05/24	F M	FINALIZE ORDER ON SECOND DIP MOTION	0.20
Subtotal B120 ASSET ANALYSIS AND RECOVERY			1.80 810.00
B150 MEETINGS OF AND COMMUNICATIONS WITH CREDITORS			
11/01/24	VJR	CORRESPOND WITH FAIRVIEW COUNSEL AND CORWIN REGARDING LEASE AMENDMENT.	0.10
11/01/24	VJR	CORRESPOND AND CONFERENCE WITH BURKHARDT REGARDING DIP MOTION. CORRESPOND WITH D. CORWIN REGARDING SAME (.1).	0.20
11/20/24	VJR	CORRESPOND WITH CORWIN REGARDING CONSTELLATION EMAIL.	0.10
11/21/24	VJR	CORRESPOND WITH CORWIN REGARDING CONSTELLATION EMAIL.	0.20
Subtotal B150 MEETINGS OF AND COMMUNICATIONS WITH CREDITORS			0.60 600.00
B160 FEE/EMPLOYMENT APPLICATIONS			
11/04/24	VJR	INTERNAL CONFERENES REGARDING FEE APPLICATIONS, TASKS, AND TIMING.	0.40
11/08/24	VJR	TEND TO FEE APPLICATIONS; CORRESPOND WITH ACCOUNTING; REVIEW NOTICE;.	0.40
11/12/24	LNJ	ENGAGED AS TO REVISIONS TO LOEB FEE APPLICATION.	0.30

MATTER # 236362-10002
INVOICE # 2550182

METROPOLITAN THEATRE CORPORATION
METROPOLITAN THEATERS BANKRUPTCY

12/12/24
Page: 3

Date	TK	Description of Services Rendered	Hours
11/12/24	A Z	CALL WITH V. RUBINSTEIN RE FEE APPLICATIONS FOR PROFESSIONALS (.2); REVIEW INVOICES OF DEBTORS' PROFESSIONALS AND DRAFT FEE APPLICATIONS (5.7)	5.90
11/13/24	VJR	CORRESPOND WITH CORWIN, HERMAN AND INTERNALLY REGARDING FEE APPLICATIONS; TEND TO REIKER INVOICES.	0.60
11/13/24	VJR	CORRESPOND WITH CORWIN REGARDING REICKER INVOICES.	0.10
11/13/24	A Z	REVIEW INVOICES OF DEBTORS' PROFESSIONALS AND DRAFT FEE APPLICATIONS (.5)	0.50
11/14/24	VJR	REVISE FEE APPLICION AND JURICH DECLARATION. WORK ON B. RILEY AND OTHER FEE APPLICATIONS.	1.30
11/14/24	A Z	DRAFT FEE APPLICATIONS ON BEHALF OF LOEB AND OTHER PROFESSIONALS (8.7)	8.70
11/15/24	F M	REVISE EXHIBIT A TO FEE APP (1.6); REVISE EXHIBIT B (.2)	1.80
11/15/24	LNJ	REVISED FEE APPLICATION OF LOEB.	0.70
11/15/24	LNJ	REVISED DECLARATION OF L. JURICH RE FEE APPLICATION.	0.20
11/15/24	LNJ	E-MAIL TO V. RUBINSTEIN RE FEE APPLICATION ISSUES.	0.10
11/15/24	VJR	WORK ON FEE APPLICATIONS AND INTERNAL CONFERENCES REGARDING SAME.	0.80
11/15/24	A Z	REVISE FEE APPLICATIONS FOR LOEB AND OTHER PROFESSIONALS	0.50
11/16/24	VJR	REVISING LOEB FEE APPLICATION AND INCORPORATING JURICH COMMENTS.	0.70
11/16/24	VJR	REVISING CORWIN DECLARATION, JURICH DECLARATION, FREEMAN DECLARATION, B. RILEY APPLICATION, REICKER APPLICATION, ROSE SNYDER APPLICATION AND BROWNSTEIN APPLICATION.	2.40
11/18/24	LNJ	REVIEWED AND REVISED LOEB FEE APPLICATION.	0.50
11/18/24	LNJ	REVIEWED AND REVISED DECLARATION OF L. JURICH.	0.40
11/18/24	LNJ	REVIEWED D. CORWIN DECLARATION AND REVISE SAME.	0.40
11/18/24	LNJ	E-MAIL FROM D. FLAHAUT RE FEE APPLICATION ISSUES.	0.10
11/18/24	LNJ	ENGAGED AS TO FEE APPLICATION NOTICE AND REVISIONS.	0.30
11/18/24	VJR	WORKING ON FEE APPLICATIONS; CORRESPOND WITH COUNSEL. CORRESPOND WITH P. HERMANN. CONFERENCE WITH FLAHAUT. DIRECT MCKEOWN AND ZOBEDEIH.	1.80

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Date	TK	Description of Services Rendered	Hours
11/18/24	A Z	REVISE FEE APPLICATIONS FOR LOEB AND OTHER PROFESSIONALS	3.10
11/19/24	VJR	FINALIZE FEE APPLICATIONS; REVISE DECLARATIONS IN CONNECTION WITH SAME; CORRESPOND WITH PROFESSIONALS AND COORDINATE FILINGS.	4.20
11/19/24	A Z	REVISE FEE APPLICATIONS AND PREPARE FEE APPLICATIONS FOR FILING FOR LOEB AND OTHER PROFESSIONALS	7.40
11/19/24	F M	FINALIZE LOEB FEE APP (.9); FINALIZE JURICH DECLARATION (.3); DRAFT HEARING NOTICE AND FINALIZE (.7); FINALIZE B RILEY FEE APP (.6); FINALIZE S. FREEMAN DECLARATION (.3); FINALIZE ROSE FEE APP (.4); FINALIZE T. ROSE DECLARATION (.3); FINALIZE REICKER FEE APP (.6); FINALIZE KEVIN NIMMONS DECLARATION (.2)	4.10
11/19/24	LNJ	ENGAGED AS TO S. FREEMAN DECLARATION AND APPLICATION FILING.	0.30
11/19/24	LNJ	ANALYZED LOEB FEE APPLICATION AND REVISIONS.	0.70
11/19/24	LNJ	ENGAGED AS TO CLIENT CALL RE DECLARATION FOR FEE APPLICATION AND SUPPLEMENTAL PLAN FILINGS.	0.80
11/19/24	LNJ	ENGAGED AS TO REVISIONS AND FILING OF FEE APPLICATIONS -- LOEB, B. REILY AND OTHER PROFESSIONALS.	1.70
11/19/24	LNJ	REVIEWED AND REVISED DECLARATION OF L. JURICH RE D. CORWIN'S REFUSAL TO SIGN DECLARATION.	1.30
11/21/24	VJR	TEND TO FILED FEE APPLICATIONS AND CORRESPOND WITH D. CORWIN REGARDING SAME.	0.30
11/25/24	LNJ	CONFERENCE WITH V. RUBINSTEIN RE FEE APPLICATION DELAY AND ISSUES.	0.20
11/25/24	LNJ	REVIEWED US TRUSTEE QUESTIONS RE FEE APPLICATIONS.	0.20
11/26/24	LNJ	E-MAIL TO V. RUBINSTEIN RE L. LANDAU RESPONSE.	0.10
11/26/24	LNJ	E-MAIL FROM L. LANDAU RE LANGUAGE FOR SUPPLEMENT.	0.10
Subtotal B160 FEE/EMPLOYMENT APPLICATIONS			53.40 41,542.00

B170 FEE/EMPLOYMENT OBJECTIONS

11/21/24	VJR	TEND TO UST REQUEST FOR ELECTRONIC RECORDS.	0.20
11/22/24	VJR	TEND TO UST REQUEST FOR LEDES DATA.	0.20
11/25/24	VJR	CORRESPOND WITH U.S. TRUSTEE REGARDING INVOICE FORMATTING; (X4) COORDINATE SAME WITH ACCOUNTING AND F. MCKEOWN (.2); CORRESPOND WITH CORWIN.	0.50

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Date	TK	Description of Services Rendered	Hours
Subtotal B170 FEE/EMPLOYMENT OBJECTIONS			0.90 900.00
B185 ASSUMPTION/REJECTION OF LEASES			
11/01/24	VJR	CORRESPOND WITH CORWIN REGARDING PASEO NUEVO ISSUES AND CONFERENCE WITH D. CORWIN.	0.20
11/15/24	VJR	CORRESPOND WITH CORWIN REGARDING LEASE REJECTION STIIP. COORDINATE FILING WITH MCKEOWN.	0.20
11/21/24	VJR	DIRECT MCKEOWN ON FILING OF REJECTION STIPULATION.	0.10
11/25/24	LNJ	E-MAIL TO L. LANDAU RE PROPOSED LANGUAGE FOR SUPPLEMENT.	0.20
11/27/24	VJR	TEND TO CURE SCHEDULE AMENDMENT AND CONFERENCES (X2) WITH P. HERMANN REGARDING SAME.	0.80
Subtotal B185 ASSUMPTION/REJECTION OF LEASES			1.50 1,500.00
B190 OTHER CONTESTED MATTERS			
11/15/24	F M	DRAFT ORDER GRANTING STIPULATION (.4); PREPARE NOTICE OF LODGMET (.1)	0.60
11/18/24	F M	ENGAGED IN REDACTING ALL INVOICES IN FEE APPLICATION	3.20
11/21/24	F M	FINALIZE STIPULATION (.2); DRAFT ORDER (.3); PREPARE NOTICE OF LODGING (.2)	0.70
Subtotal B190 OTHER CONTESTED MATTERS			4.50 2,025.00
B210 BUSINESS OPERATIONS			
11/08/24	VJR	CORRESPOND AND CONFERENCE WITH D. CORWIN REGARDING STATUS OF NEGOTIATIONS, FINANCING AND RELATED ISSUES.	0.70
11/12/24	VJR	CORRESPOND AND CONFERENCE WITH ZOBEDEIGH AND MCKEOWN REGARDING FEE APPLICATIONS (.5). REVIEW MATERIALS (.2). CORRESPOND WITH D. CORWIN.	0.90
Subtotal B210 BUSINESS OPERATIONS			1.60 1,600.00
B230 FINANCING/CASH COLLECTIONS			
11/01/24	LNJ	ENGAGED AS TO ISSUES RE DIP FINANCING AND EX PARTE HEARING.	0.20
11/01/24	LNJ	E-MAIL FROM V. RUBINSTEIN.	0.10
11/01/24	LNJ	REVIEWED AND REVISED PLEADINGS AND DECLARATION.	0.20

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11/01/24	VJR	REVISE AND FINALIZE DIP PAPERS (SEVERAL REVISIONS); CORRESPOND WITH D. CORWIN, S. FREEDMAN, F. MCKEOWN. COORDINATE SERVICE WITH DONLIN AND CORRESPOND WITH CORWIN REGARDING SAME.	3.70
11/05/24	LNJ	ENGAGED AS TO ORDER AND DIP HEARING ISSUES.	0.20
11/05/24	VJR	PREPARE FOR (.7) AND ATTEND (.4) HEARING ON EMERGENCY MOTION; CONFERENCE WITH D. CORWIN PRIOR TO HEARING (.2). COORDINATE FILING OF DIP ORDER (.1).	1.40
11/07/24	LNJ	REVIEWED ORDER RE DIP.	0.10
Subtotal B230 FINANCING/CASH COLLECTIONS			5.90 5,900.00

B320 PLAN AND DISCLOSURE STATEMENT

11/07/24	VJR	CONFERENCE WITH D. CORWIN REGARDING STATUS OF LEASE NEGOTIATIONS, FINANCING AND RELATED ISSUES.	0.10
11/12/24	LNJ	ENGAGED AS TO PLAN ISSUES AND FILINGS.	0.20
11/12/24	LNJ	CONFERENCE WITH V. RUBINSTEIN RE FILING ISSUES.	0.10
11/12/24	LNJ	E-MAIL TO S. FREEMAN RE HEARING TESTIMONY RE FEASIBILITY.	0.10
11/13/24	LNJ	ENGAGED AS TO PLAN SUPPLEMENT ISSUES AND STATUS.	0.20
11/14/24	LNJ	ENGAGED AS TO PLAN ISSUES, OFFICE LEASE; CONFERENCE WITH V. RUBINSTEIN RE STATUS.	0.20
11/14/24	VJR	CONFERENCES WITH P. HERMANN REGARDING FEASIBILITY EVIDENCE AND RELATED ISSUES.	0.60
11/15/24	LNJ	ENGAGED AS TO PLAN SUPPLEMENTAL EVIDENCE ISSUES.	0.20
11/19/24	VJR	CORRESPOND WITH CORWIN AND HERMANN PRIOR TO CALL (.1) AND ON CALL (.8).	0.90
11/20/24	LNJ	E-MAIL FROM CONSTELLATION NEW ENERGY.	0.10
11/20/24	LNJ	E-MAIL FROM D. CORWIN RE PAYMENT.	0.10
11/20/24	VJR	CORRESPOND WITH P. HERMANN REGARDING SUPPLEMENTAL FILING.	0.20
11/21/24	LNJ	ENGAGED AS TO PLAN SUPPLEMENT ISSUES AND FILING PREPARATION.	0.30
11/21/24	VJR	REVIEW HERMANN CHART AND CONFERENCE WITH HIM REGARDING SAME (.3). REVIEW REVISED CHART.	0.40

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Date	TK	Description of Services Rendered	Hours
11/21/24	VJR	CONFERENCE WITH S. FREEMAN REGARDING SUPPLEMENTAL FILING AND SOURCES AND USES SCHEDULE.	0.30
11/22/24	LNJ	E-MAIL FROM D. CORWIN.	0.10
11/22/24	LNJ	ENGAGED AS TO SUPPLEMENTAL FILING AND REVISIONS TO DRAFT.	0.30
11/22/24	VJR	PREPARE DRAFT SUPPLEMENTAL FILING AND BEGIN FREEMAN DECLARATION (2.1). CORRESPOND WITH CORWIN (.1), JURICH (.1) AND FREEMAN (.1) REGARDING SAME.	2.40
11/23/24	LNJ	ENGAGED AS TO SUPPLEMENTAL FILING, REVIEW D. CORWIN STATUS RE FINANCING AND CONFIRMATION FEASIBILITY.	0.30
11/23/24	LNJ	REVIEWED AND REVISED SUPPLEMENTAL DECLARATION OF D. CORWIN.	0.80
11/23/24	LNJ	E-MAIL FROM V. RUBINSTEIN RE DRAFT OF D. CORWIN DECLARATION.	0.10
11/23/24	VJR	ANALYZE CORWIN CHANGES TO SUPPLEMENTAL FILING DRAFT. BEGIN DRAFT OF CORWIN DECLARATION.	0.70
11/24/24	LNJ	E-MAIL TO V. RUBINSTEIN RE COMMENTS TO D. CORWIN.	0.20
11/24/24	VJR	FINALIZE INITIAL DRAFTS OF CORWIN AND FREEMAN DECLARATIONS IN SUPPORT OF SUPPLEMENTAL FILING AND CORRESPOND WITH FREEMAN AND CORWIN REGARDING SAME.	1.10
11/25/24	VJR	WORKING ON SUPPLEMENTAL FILING IN CONNECTION WITH CONFIRMATION (1) AND CONFERENCE WITH CORWIN REGARDING SAME (.2).	1.20
11/25/24	LNJ	E-MAIL TO V. RUBINSTEIN RE EXTENSION OF DATES.	0.10
11/26/24	VJR	CORRESPOND WITH D. CORWIN REGARDING ADJOURNMENT (.1). CONTACT CHAMBERS REGARDING ADJOURNMENT (.2), DRAFT ADJOURNMENT MOTION, ORDER AND DECLARATION; COORDINATE FILING AND SERVICE (3.3).	3.60
11/26/24	LNJ	ENGAGED AS TO REVISIONS TO MOTION TO EXTEND DATES.	0.50
11/26/24	LNJ	ENGAGED AS TO FILING AND REVISIONS TO EXTENSION STIPULATION.	0.30
11/29/24	VJR	CONFERENCE WITH L. JURICH REGARDING PLAN ISSUES AND TIMING, REVISED ASSUMPTION SCHEDULE AND PLAN SUPPLEMENT ISSUES.	0.20
11/29/24	VJR	REVISE CORWIN DECLARATION, SUPPLEMENTAL FILING AND FREEMAN DECLARATION. CORRESPOND WITH CORWIN AND HERMANN REGARDING SAME.	1.20

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Date	TK	Description of Services Rendered	Hours
11/29/24	LNJ	ENGAGED AS TO SUPPLEMENTAL FILING AND REVISIONS.	0.30
11/29/24	LNJ	CONFERENCE WITH V. RUBINSTEIN RE REVISED CURE LIST FOR PLAN AND PLAN SUPPLEMENTAL ISSUES.	0.20
Subtotal B320 PLAN AND DISCLOSURE STATEMENT			17.60 17,600.00

Time and Fee Summary

Timekeeper	Init	Hours	Rate	Fee Value
L JURICH	LNJ	14.20	1,000.00	14,200.00
F MCKEOWN	F M	12.20	450.00	5,490.00
V RUBINSTEIN	VJR	35.70	1,000.00	35,700.00
A ZOBEIDEH	A Z	26.10	670.00	17,487.00
TOTAL		88.20		72,877.00

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Page: 9**STATEMENT OF PRIOR OUTSTANDING INVOICES**

INVOICE NUMBER	INVOICE DATE	INVOICE AMOUNT	PAYMENTS TO DATE	INVOICE BALANCE
2511900	05/15/24	305,844.00	0.00	305,844.00
2513896	05/29/24	87,094.00	0.00	87,094.00
2519892	06/30/24	116,327.71	0.00	116,327.71
2525252	07/31/24	68,222.90	0.00	68,222.90
2534237	09/23/24	71,264.00	0.00	71,264.00
2540748	10/31/24	104,150.00	0.00	104,150.00
2545618	11/12/24	35,620.52	0.00	35,620.52
TOTALS		788,523.13	0.00	788,523.13



JANUARY 14, 2025
INVOICE NO. 2555283

METROPOLITAN THEATRES CORPORATION
ATTENTION: DAVID CORWIN
17101 VALLEY VIEW AVE
CERRITOS, CA 90703

PAYMENT DUE UPON RECEIPT

RE: METROPOLITAN THEATERS BANKRUPTCY
OUR FILE NO: 236362-10002

FEES FOR PROFESSIONAL SERVICES RENDERED AS PER ATTACHED DETAIL	38,702.00
DISBURSEMENTS MADE FOR YOUR ACCOUNT AS PER ATTACHED DETAIL	53.27
TOTAL CURRENT AMOUNT DUE	38,755.27
OTHER OUTSTANDING INVOICES (PER ATTACHED DETAIL)	746,400.13
TOTAL AMOUNT DUE	785,155.40

PAYMENT OPTIONS

Payment by wire or ACH, please use the following:

City National Bank
2029 Century Park East
Los Angeles, CA 90067

ABA: 122016066
Account no: 210-034722
Beneficiary: Loeb & Loeb LLP – General Account
SWIFT Code: CINAUS6L

Payment by check, please remit to:

Loeb & Loeb LLP
10100 Santa Monica Blvd
Suite 2200
Los Angeles, CA 90067

** Please include as a reference client no: 236362 or invoice number 2555283
To aid in application of the payment, details should be sent to epayment@loeb.com

If our account details change, we will notify these to you by letter, phone or face-to-face and never by email.

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Date	TK	Description of Services Rendered	Hours
B110 CASE ADMINISTRATION			
12/05/24	F M	FINALIZE CERTIFICATE OF SERVICE	0.10
12/10/24	F M	FINALIZE MONTHLY OPERATING REPORT	0.10
12/16/24	F M	ASSIST ATTORNEY PREPARE FOR FEE APPLICATION HEARING	0.60
12/17/24	F M	FINALIZE PROOF OF SERVICE	0.10
Subtotal B110 CASE ADMINISTRATION			0.90 405.00
B114 NEGOTIATION WITH LANDLORDS			
12/05/24	LNJ	E-MAIL FROM D. CORWIN RE OFFICE LEASE.	0.10
12/08/24	LNJ	ENGAGED AS TO STATUS OF LEASE CREDITOR RE CURE.	0.10
12/12/24	VJR	TEND TO BURKHARDT REQUEST FOR ADDITIONAL TIME, CONFERENCE WITH HIM REGARDING SAME AND CORRESPOND WITH CORWIN REGARDING SAME.	0.20
12/13/24	VJR	CONFERENCE WITH I. GOLD.	0.20
12/31/24	VJR	REVIEW AND REVISE LEASE AMENDMENT AND TIC AGREEMENT AMENDMENT (2.6). CORRESPOND WITH L. JURICH REGARDING SAME (.3). INCORPORATE JURICH CHANGES AND CORRESPOND WITH CORWIN REGARDING SAME (.4).	3.30
Subtotal B114 NEGOTIATION WITH LANDLORDS			3.90 3,900.00
B150 MEETINGS OF AND COMMUNICATIONS WITH CREDITORS			
12/03/24	VJR	CONFERENCE WITH D. NIRSCHEL, COUNSEL FOR SANTA BARBARA.	0.20
12/05/24	VJR	CORRESPOND WITH SANTA BARBARA COUNSEL REGARDING LIQUIDATION OF CLAIM.	0.10
12/09/24	VJR	CORRESPOND WITH DISNEY COUNSEL (X2).	0.10
12/09/24	VJR	CONFERENCE WITH SANTA BARBARA ATTORNEY	0.10
12/10/24	VJR	CORRESPOND WITH PASEO COUNSEL REGARDING CLIENT DISCUSSIONS.	0.10
12/10/24	VJR	CONFERENCE WITH SANTA BARBARA ATTORNEY.	0.40
12/10/24	VJR	CORRESPOND WITH CORWIN AND LANDAU REGARDING OBJECTION DEADLINE; CONFERENCE WITH D.CORWIN REGARDING SAME.	0.30
12/10/24	VJR	ANALYZE CAMINO PLAN OBJECTION AND CORRESPOND WITH CORWIN AND JURICH.	0.10

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		Subtotal B150 MEETINGS OF AND COMMUNICATIONS WITH CREDITORS	1.40 1,400.00
B160 FEE/EMPLOYMENT APPLICATIONS			
12/02/24	VJR	CORRESPOND AND CONFERENCE WITH D> SHEVITZ REGARDING FEE REDUCTION.	0.30
12/03/24	A Z	REVISE PLAN SUPPLEMENT (.6)	0.60
12/05/24	F M	FINALIZE SUPPLEMENT IN SUPPORT OF LOEB'S FEE APP	0.20
12/05/24	VJR	DRAFT AND COORDINATE FILING OF SUPPLEMENT TO FEE APPLICATION (.4); CONFERENCE WITH D. CORWIN REGARDING SAME (.1).	0.50
12/13/24	LNJ	CONFERENCE WITH S. FREEMAN RE FEE APPLICATION.	0.10
12/16/24	LNJ	ENGAGED AS TO PRE-HEARING ISSUES RE COURT HEARING.	0.30
12/16/24	LNJ	TELEPHONE FROM D. CORWIN RE ATTENDANCE AT HEARING.	0.10
12/17/24	F M	DRAFT PROPOSED ORDER ON LOEB FREE APP (.4); DRAFT B. RILEY PROPOSED ORDER (.2)	0.60
12/17/24	LNJ	ENGAGED AS TO PREPARE FOR HEARING WITH V. RUBINSTEIN RE FEE APPLICATIONS.	0.30
12/17/24	LNJ	E-MAIL FROM D. FLAHAUT RE PAYMENT AND ORDER.	0.10
12/18/24	F M	REVISE LOEB'S FEE APP ORDER (.3); DRAFT ROSE SNYDER FEE ORDER (.5); REVISE B. RILEY ORDER (.3); DRAFT RICKER ORDER (.5)	1.60
12/18/24	LNJ	REVIEWED AND REVISED ORDER FROM FEE APPLICATIONS.	0.20
12/18/24	LNJ	ENGAGED AS TO ISSUES RE OTHER HEARING DATES FROM CLERK.	0.20
12/18/24	VJR	CORRESPOND WITH CLIENTS REGARDING FLAHAUT FEE APPLICATION.	0.10
12/19/24	F M	DRAFT NOTICES OF LODGING FOR FEE ORDERS FOR LOEB (.3) REICKER PFAU (.3); ROSE (.3); AND B. RILEY (.3); FINALIZE FEE ORDERS FOR LOEB (.2) REICKER PFAU (.2); ROSE (.2); AND B. RILEY (.2)	2.00
12/19/24	LNJ	ENGAGED AS TO STATUS OF ORDERS RE FEE APPLICATIONS.	0.20
12/23/24	LNJ	CONFERENCE WITH COURT CLERK RE ORDER.	0.10
12/23/24	LNJ	ENGAGED AS TO B. RILEY ORDER STATUS.	0.10
12/26/24	LNJ	REVIEWED ORDER RE B. RILEY.	0.10

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Date	TK	Description of Services Rendered	Hours
12/26/24	LNJ	E-MAIL TO S. FREEMAN RE ORDER.	0.10
Subtotal B160 FEE/EMPLOYMENT APPLICATIONS			7.80 5,182.00
B170 FEE/EMPLOYMENT OBJECTIONS			
12/05/24	LNJ	REVISED AND FILE SUPPLEMENTAL FEE APPLICATION.	0.20
Subtotal B170 FEE/EMPLOYMENT OBJECTIONS			0.20 200.00
B185 ASSUMPTION/REJECTION OF LEASES			
12/03/24	LNJ	E-MAIL TO L. LANDAU RE OFFICE LEASE.	0.10
12/04/24	LNJ	REVIEWED ORDER RE LEASE REJECTION.	0.10
12/05/24	VJR	CORRESPOND WITH SPHERE COUNSEL AND D. CORWIN.	0.20
12/06/24	LNJ	E-MAIL FROM L. LANDAU RE STATUS.	0.10
12/06/24	LNJ	E-MAIL FROM V. RUBINSTEIN RE RESPONSE TO LANDLORD.	0.10
12/06/24	VJR	CORRESPOND WITH L. LANDAU AND D. CORWIN.	0.20
12/09/24	VJR	CORRESPOND WITH D. CORWIN REGARDING STATUS OF NEGOTIATIONS (X2).	0.20
12/12/24	LNJ	E-MAIL FROM L. LANDAU RE OFFICE LEASE.	0.10
12/12/24	LNJ	E-MAIL TO L. LANDAU RE SAME.	0.10
12/13/24	LNJ	E-MAIL TO L. LANDAU RE OBJECTION.	0.10
12/13/24	LNJ	E-MAIL FROM L. LANDAU RE OBJECTION.	0.10
12/24/24	LNJ	ENGAGED AS TO ISSUES RE B. RILEY ORDER.	0.10
12/26/24	LNJ	CONFERENCE WITH D. CORWIN RE LEASE ASSUMPTION ISSUES.	0.10
12/26/24	LNJ	E-MAIL TO AND FROM D. CORWIN RE LEASE ASSUMPTION.	0.10
12/28/24	LNJ	REVIEWED OFFICE LEASE ISSUES.	0.30
12/31/24	LNJ	ENGAGED AS TO REVISIONS TO OFFICE LEASE AMENDMENT.	0.80
12/31/24	LNJ	CONFERENCE WITH V. RUBINSTEIN RE AGREEMENT REVISIONS.	0.30
12/31/24	LNJ	ENGAGED AS TO REVISIONS TO TIC AGREEMENT AMENDMENT.	0.40
12/31/24	LNJ	E-MAIL TO D. CORWIN RE OFFICE LEASE.	0.10
Subtotal B185 ASSUMPTION/REJECTION OF LEASES			3.60 3,600.00

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Date	TK	Description of Services Rendered	Hours
B190 OTHER CONTESTED MATTERS			
12/03/24	F M	PREPARE FIRST DRAFT OF PLAN NOTICE (.9); RESEARCH REGARDING OBJECTION DEADLINE (.7); PREPARE UPDATED SCHEDULE OF ASSUMED LEASES (1.1); PREPARE UPDATED REJECTION SCHEDULE (2.3); REVIEW AND REVISE PLAN NOTICE (.6); FINALIZE CORWIN DECLARATION (.4)	5.90
Subtotal B190 OTHER CONTESTED MATTERS			5.90 2,655.00
B210 BUSINESS OPERATIONS			
12/09/24	VJR	REVIEW MOR. CORRESPOND REGARDING SAME. HAVE MOR FILED.	0.30
Subtotal B210 BUSINESS OPERATIONS			0.30 300.00
B320 PLAN AND DISCLOSURE STATEMENT			
12/02/24	LNJ	E-MAIL FROM S. FREEMAN RE SUPPLEMENTAL CORWIN DECLARATION.	0.10
12/02/24	LNJ	REVIEWED AND REVISED SUPPLEMENTAL CORWIN DECLARATION.	0.10
12/02/24	LNJ	REVIEWED SOURCES AND USES RE CONFERENCE.	0.20
12/02/24	LNJ	REVIEWED AND REVISED SUPPLEMENTAL FILING.	0.20
12/02/24	VJR	CORRESPOND WITH CORWIN AND HERMANN REGARDING EXHIBITS TO SUPPLEMENTAL FILING (SEVERAL) (.5). CONFERENCE CALL WITH HERMANN REGARDING EXHIBITS (.3). REVISING SUPPLEMENTAL FILING DOCUMENTS = FREEDMAN DECLARATION, CORWIN DECLARATION AND SUPPLEMENTAL FILINGS (1.4).	2.20
12/02/24	VJR	CORRESPOND WITH D. CORWIN REGARDING GUC CALCULATIONS.	0.10
12/03/24	LNJ	ENGAGED AS TO SUPPLEMENTAL FILING.	0.30
12/03/24	LNJ	REVIEWED CORWIN DECLARATION.	0.10
12/03/24	LNJ	ENGAGED AS TO S. FREEMAN DECLARATION REVISIONS.	0.20
12/03/24	LNJ	CONFERENCE WITH V. RUBINSTEIN RE FILING.	0.20
12/03/24	VJR	REVISING SUPPLEMENTAL FILINGS, INCLUDING CURE SCHEDULE (1.2), EXHIBITS, CORWIN DECLARATION, NOTICE OF SUPPLEMENTAL FILINGS (1.2). CONFERENCES AND CORRESPOND WITH HERMANN (.3). COORDINATE FILING (.7).	3.40
12/04/24	LNJ	ENGAGED AS TO PLAN ISSUES.	0.20
12/04/24	VJR	CORRESPOND WITH HERMANN AND CORWIN REGARDING LANDAU CORRESPONDENCE AND PLAN PROJECTIONS.	0.10

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Date	TK	Description of Services Rendered	Hours
12/05/24	LNJ	E-MAIL FROM E. BURKHART RE CURE AMOUNT DISCREPANCY.	0.10
12/05/24	VJR	CONFERENCE WITH D. CORWIN REGARDING PLAN AND FESIBILITY ISSUES.	0.40
12/05/24	VJR	CONFERENCE WITH P. HERMANN AND DAVID CORWIN REGARDING FEASIBILITY ISSUES.	0.30
12/08/24	LNJ	CONFERENCE WITH V. RUBINSTEIN RE PLAN FEASIBILITY ISSUES.	0.10
12/08/24	VJR	CONFERENCE WITH L. JURICH REGARDING FEASIBILITY.	0.10
12/10/24	LNJ	REVIEWED OBJECTION BY AEGON.	0.20
12/10/24	LNJ	REVIEWED LANDLORD OBJECTION.	0.10
12/10/24	LNJ	REVIEWED 2ND LANDLORD OBJECTION.	0.10
12/10/24	LNJ	E-MAIL FROM L. LANDAU RE OBJECTION.	0.10
12/10/24	LNJ	E-MAIL TO L. LANDAU RE RESPONSE.	0.10
12/10/24	LNJ	ENGAGED AS TO EXTENSION AND D. CORWIN RESPONSE.	0.10
12/10/24	VJR	ANALYZE FAIRVIEW OBJECTION AND CORRESPOND WITH CORWIN REGARDING SAME.	0.10
12/11/24	LNJ	REVISED SUMMARY OF OBJECTIONS.	0.20
12/11/24	LNJ	E-MAIL FROM D. CORWIN RE STATUS.	0.10
12/11/24	LNJ	ENGAGED AS TO FEASIBILITY ISSUES.	0.20
12/11/24	VJR	ANALYZE AEGON OBJECTION (.1) AND EMAIL MEMO TO CORWIN REGARDING SAME (.2) AND FURTHER CORRESPOND WITH CORWIN (.2).	0.50
12/11/24	VJR	CORRESPOND WITH SHEVITZ REGARDING FILING AND TIMING.	0.10
12/12/24	LNJ	ENGAGED AS TO ISSUES RE PLAN OBJECTIONS.	0.20
12/12/24	VJR	PREPARE FOR AND CONFERENCE WITH CORWIN AND HERMANN REGARDING CONFIRMATION ISSUES, AEGON, LANDLORDS AND PROJECTIONS.	0.80
12/12/24	VJR	COMMUNICATE WITH COURT REGARDING CONFIRMATION HEARING NOT MOVING FORWARD.	0.20
12/13/24	VJR	CORRESPOND WITH D. SHEVITZ REGARDING COFIRMATION HEARING.	0.10
12/16/24	F M	FINALIZE SUPPLEMENT	0.20

MATTER # 236362-10002
INVOICE # 2555283

METROPOLITAN THEATRE CORPORATION
METROPOLITAN THEATERS BANKRUPTCY

01/14/25
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Date	TK	Description of Services Rendered	Hours
12/16/24	LNJ	REVIEWED AND REVISED REPLY TO OBJECTIONS.	0.20
12/16/24	VJR	DRAFT AND REVISE REPLY TO OBJECTIONS TO SUPPLEMENTAL FILING [1.7]; CORRESPOND WITH D. CORWIN REGARDING SAME [.1]. REVIEW AND INCORPORATE CORWIN CHANGES [.2]. COORDINATE FILING AND SERVICE [.1].	2.10
12/17/24	LNJ	MEETING WITH LAWYERS AND CLIENT BEFORE HEARING.	0.50
12/17/24	LNJ	ENGAGED AS TO HEARING ON FEE APPLICATIONS AND CONFIRMATION.	1.00
12/17/24	LNJ	ENGAGED AS TO POST HEARING MEETING WITH AEGIS, LANDLORD AND CHAPTER 5 TRUSTEE.	0.50
12/17/24	VJR	CONFERENCE WITH L. JURICH PRIOR TO HEARING (.2). PREPARE FOR HEARING (.4). ATTEND HEARING (.5).	1.10
12/18/24	VJR	CONFERENCE WITH D. CORWIN (.3). CORRESPOND WITH COURT (X4) REGARDING ADJOURNMENT AND AMEND SCHEDULING ORDER IN CONNECTION WITH SAME (.5).	0.70
12/19/24	VJR	CORRESPOND WITH D. CORWIN REGARDING REVISED SCHEDULE (.3). DRAFT STIPULATION AND CORRESPOND WITH COUNSEL REGARDING SAME (1.4).	1.70
12/20/24	LNJ	REVIEWED E-MAILS FROM CREDITORS RE SCHEDULING ORDER.	0.20
12/20/24	LNJ	E-MAIL FROM US TRUSTEE RE STIPULATION.	0.10
12/20/24	VJR	TEND TO ADJOURNMENT STIPULATION AND CORRESPOND WITH COUNSEL REGARDING SAME.	0.20
12/22/24	VJR	TEND TO SCHEDULING STIPULATION AND ORDER (.2). CORRESPOND WITH MCKEOWN AND JURICH REGARDING SAME (.1). CORRESPOND WITH COUNSEL (.1).	0.40
12/23/24	F M	FINALIZE STIPULATION (.3); FINALIZE SCHEDULING ORDER (.2); PREPARE NOTICE OF LODGING (.1)	0.60
12/23/24	LNJ	REVIEWED AND REVISED V. RUBINSTEIN E-MAIL TO CLIENT.	0.10
12/23/24	LNJ	ENGAGED AS TO LODGING VARIOUS NOTICE AND ORDER RE HEARING DATE.	0.30
Subtotal B320 PLAN AND DISCLOSURE STATEMENT			21.50 21,060.00

MATTER # 236362-10002
INVOICE # 2555283METROPOLITAN THEATRE CORPORATION
METROPOLITAN THEATERS BANKRUPTCY01/14/25
Page: 8**Time and Fee Summary**

Timekeeper	Init	Hours	Rate	Fee Value
L JURICH	LNJ	11.40	1,000.00	11,400.00
F MCKEOWN	F M	12.00	450.00	5,400.00
V RUBINSTEIN	VJR	21.50	1,000.00	21,500.00
A ZOBEIDEH	A Z	0.60	670.00	402.00
	TOTAL	45.50		38,702.00

Disbursement Detail

Date	Description of Disbursements	Amount
12/16/24	VENDOR: IDISCOVER, LLC - INV# 100469 INV DATE 12/16/24 SERVICE FEE - REQUESTED BY: FIONA MCKEOWN JOB DESCRIPTION: BLOWBACK 234 PRINTING (BLOWBACKS) WITH ASSEMBLY 7 TABS 1 BINDERS " 1"	43.27
12/17/24	PAYEE: LANCE JURICH - INV# 7147964112310803 - PARKING - HEARING RE FEE APPLICATIONS.	10.00
	TOTAL	53.27

MATTER # 236362-10002
INVOICE # 2555283

METROPOLITAN THEATRE CORPORATION
METROPOLITAN THEATERS BANKRUPTCY

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STATEMENT OF PRIOR OUTSTANDING INVOICES

INVOICE NUMBER	INVOICE DATE	INVOICE AMOUNT	PAYMENTS TO DATE	INVOICE BALANCE
2511900	05/15/24	305,844.00	115,000.00	190,844.00
2513896	05/29/24	87,094.00	0.00	87,094.00
2519892	06/30/24	116,327.71	0.00	116,327.71
2525252	07/31/24	68,222.90	0.00	68,222.90
2534237	09/23/24	71,264.00	0.00	71,264.00
2540748	10/31/24	104,150.00	0.00	104,150.00
2545618	11/12/24	35,620.52	0.00	35,620.52
2550182	12/12/24	72,877.00	0.00	72,877.00
TOTALS		861,400.13	115,000.00	746,400.13



10100 SANTA MONICA BLVD
SUITE 2200
LOS ANGELES, CA 90067
(310) 282-2000 IRS #95-1780806

FEBRUARY 10, 2025
INVOICE NO. 2559531

METROPOLITAN THEATRES CORPORATION
ATTENTION: DAVID CORWIN
17101 VALLEY VIEW AVE
CERRITOS, CA 90703

PAYMENT DUE UPON RECEIPT

RE: METROPOLITAN THEATERS BANKRUPTCY
OUR FILE NO: 236362-10002

FEES FOR PROFESSIONAL SERVICES RENDERED AS PER ATTACHED DETAIL	18,493.00
DISBURSEMENTS MADE FOR YOUR ACCOUNT AS PER ATTACHED DETAIL	37.20
TOTAL CURRENT AMOUNT DUE	18,530.20
OTHER OUTSTANDING INVOICES (PER ATTACHED DETAIL)	785,155.40
TOTAL AMOUNT DUE	803,685.60

PAYMENT OPTIONS

Payment by wire or ACH, please use the following:

City National Bank
2029 Century Park East
Los Angeles, CA 90067

ABA: 122016066
Account no: 210-034722
Beneficiary: Loeb & Loeb LLP – General Account
SWIFT Code: CINAUS6L

Payment by check, please remit to:

Loeb & Loeb LLP
10100 Santa Monica Blvd
Suite 2200
Los Angeles, CA 90067

** Please include as a reference client no: 236362 or invoice number 2559531
To aid in application of the payment, details should be sent to epayment@loeb.com

If our account details change, we will notify these to you by letter, phone or face-to-face and never by email.

MATTER # 236362-10002
INVOICE # 2559531

METROPOLITAN THEATRE CORPORATION
METROPOLITAN THEATERS BANKRUPTCY

02/10/25
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Date	TK	Description of Services Rendered	Hours
B114 NEGOTIATION WITH LANDLORDS			
01/25/25	VJR	ANALYZE SETTLEMENT LETTER AND AGING ANALYSIS (.2) ; CORRESPOND WITH CORWIN AND HERMANN REGARDING SAME (.3). PRORATION RESEARCH (.5).	1.00
Subtotal B114 NEGOTIATION WITH LANDLORDS			1.00 1,000.00
B150 MEETINGS OF AND COMMUNICATIONS WITH CREDITORS			
01/15/25	LNJ	ENGAGED AS TO ISSUES RE CREDITOR CALL (JOHN GAIE).	0.10
01/15/25	VJR	RETURN CREDITOR CALL.	0.10
01/16/25	VJR	RETURN CREDITOR CALL -- FUSE.	0.10
01/17/25	VJR	CORRESPOND WITH SHEVITZ, BERNADETTE AND CLIENTS REGARDING MOR.	0.10
01/23/25	LNJ	TELEPHONE FROM CREDITOR RE BANKRUPTCY.	0.10
01/28/25	VJR	DRAFT RESPONSE TO US TRUSTEE QUESTION AND CORRESPOND WITH CLIENTS REGARDING SAME.	0.70
01/30/25	VJR	CONFERENCE WITH I. GOLD.	0.30
Subtotal B150 MEETINGS OF AND COMMUNICATIONS WITH CREDITORS			1.50 1,500.00
B185 ASSUMPTION/REJECTION OF LEASES			
01/02/25	LNJ	ENGAGED AS TO OFFICE LEASE ISSUES.	0.30
01/03/25	LNJ	CONFERENCE WITH V. RUBINSTEIN RE LANDLORD REVISIONS TO STIPULATION.	0.10
01/03/25	LNJ	REVISED COVER E-MAIL TO L. LANDAU.	0.20
01/03/25	LNJ	REVIEWED AND REVISED AMENDMENTS.	0.30
01/03/25	LNJ	E-MAIL TO D. CORWIN RE DRAFTS.	0.10
01/03/25	VJR	REVIEW AND REVISE LEASE AMENDMENT AND RELATED AGREEMENT (2.3). CORRESPOND WITH CORWIN REGARDING SAME. MAKE ADDITIONAL CHANGES. COVER MAIL TO L. LANDAU.	2.90
01/15/25	LNJ	E-MAIL TO AND FROM L. LANDAU RE STATUS.	0.10
01/15/25	VJR	CORRESPOND WITH D. CORWIN REGARDING CAMINO AND OFFICE LEASE.	0.10
01/17/25	LNJ	ENGAGED AS TO LANDLORD RENT ISSUES.	0.10

MATTER # 236362-10002
 INVOICE # 2559531

METROPOLITAN THEATRE CORPORATION
 METROPOLITAN THEATERS BANKRUPTCY

02/10/25
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Date	TK	Description of Services Rendered	Hours
01/28/25	LNJ	ENGAGED AS TO STATUS OF LEASE AMENDMENTS.	0.10
01/29/25	LNJ	E-MAIL TO L. LANDAU RE STATUS.	0.10
01/29/25	LNJ	E-MAIL FROM L. LANDAU RE RESPONSE.	0.10
01/30/25	LNJ	ENGAGED AS TO OFFICE LEASE ISSUES AND L. LANDAU RESPONSE.	0.10
Subtotal B185 ASSUMPTION/REJECTION OF LEASES			4.60 4,600.00

B210 BUSINESS OPERATIONS

01/02/25	VJR	CONFERENCE WITH D. CORWIN REGARDING FINANCING AND BUSINESS OPERATIONS.	0.70
01/13/25	VJR	REVIEW MOR AND COORDINATE FILING.	0.20
01/13/25	VJR	CONFERENCE WITH P. HERMANN REGARDING MOR.	0.20
01/15/25	LNJ	ENGAGED AS TO US TRUSTEE QUESTIONS RE MOR.	0.10
01/15/25	LNJ	E-MAIL FROM D. SHEVITZ.	0.10
01/15/25	VJR	CORRESPOND WITH CLIENTS REGARDING SHEVITZ EMAIL.	0.10
01/16/25	VJR	CONFERENCE WITH P. HERMANN REGARDING MORS AND RELATED ISSUES (.2). CONFERENCE WITH S. FREEMAN REGARDING SAME (.1). CORRESPOND WITH D. SHEVITZ (.1).	0.40
01/24/25	VJR	ANALYZE AP SPREADSHEET AND CORRESPOND WITH HERMANN REGARDING SAME.	0.30
01/27/25	VJR	CONFERENCE WITH P. HERMANN REGARDING MOR AND A/P.	0.30
Subtotal B210 BUSINESS OPERATIONS			2.40 2,400.00

B310 CLAIMS ADMINISTRATION AND OBJECTIONS

01/23/25	VJR	ANALYZE CITY OF SANTA BARBARA LETTER AND CORRESPOND WITH CLIENTS REGARDING SAME.	0.40
Subtotal B310 CLAIMS ADMINISTRATION AND OBJECTIONS			0.40 400.00

B320 PLAN AND DISCLOSURE STATEMENT

01/02/25	F M	FINALIZE PROOFS OF SERVICE	0.20
01/04/25	LNJ	ENGAGED AS TO STATUS OF NEW LOAN.	0.10
01/04/25	LNJ	CONFERENCE WITH V. RUBINSTEIN RE PLAN CONFERENCE ISSUES.	0.20
01/04/25	LNJ	ENGAGED AS TO PLAN CONFIRMATION AND BRIEF PREPARATION.	0.30

MATTER # 236362-10002
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METROPOLITAN THEATRE CORPORATION
METROPOLITAN THEATERS BANKRUPTCY

02/10/25
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Date	TK	Description of Services Rendered	Hours
01/04/25	VJR	CONFIRMATION BRIEF CONFERENCE WITH JURICH.	0.20
01/08/25	LNJ	ENGAGED AS TO ISSUES RE SUPPLEMENTAL BRIEFING FOR CONFIRMATIONL.	0.10
01/08/25	VJR	CORRESPOND WITH HERMANN REGARDING MOR AND RELATED ISSUES. TEND TO SCHEDULING ORDER.	0.20
01/09/25	LNJ	ENGAGED AS TO OFFICE LEASE ISSUES.	0.10
01/09/25	VJR	RETURN CREDIOR CALL.	0.10
01/10/25	VJR	CONFERENCE WITH D. CORWIN.	0.20
01/13/25	LNJ	ENGAGED AS TO PLAN SUPPLEMENT ISSUES AND REVISIONS.	0.30
01/14/25	LNJ	ENGAGED AS TO PLAN SUPPLEMENT ISSUES.	0.20
01/14/25	VJR	REVISING PLAN.	0.60
01/15/25	LNJ	ENGAGED AS TO PLAN SUPPLEMENT ISSUES.	0.20
01/16/25	VJR	DRAFTING CONFIRMATION ORDER. REVISING PLAN.	1.50
01/17/25	LNJ	E-MAIL FROM B. LOMBARDO RE MOR.	0.10
01/17/25	LNJ	CONFERENCE WITH V. RUBINSTEIN RE PLAN ISSUES AND MOR.	0.10
01/20/25	VJR	FINISH REVISION OF SECOND MODIFIED FIRST AMENDMENT PLAN.	1.30
01/22/25	VJR	CONFERENCE WITH D. CORWIN REGARDING PLAN ISSUES.	0.20
01/22/25	VJR	CONFERENCE WITH P. HERMANN REGARDING PLAN ISSUES AND UST REQUEST.	0.20
01/23/25	LNJ	CONFERENCE WITH V. RUBINSTEIN RE PLAN ISSUES AND US TRUSTEE REQUEST.	0.20
01/28/25	LNJ	ENGAGED AS TO PLAN SUPPLEMENT AND CONFIRMATION ISSUES.	0.30
01/30/25	LNJ	ENGAGED AS TO PLAN SUPPLEMENT ISSUES.	0.20
01/30/25	VJR	CONFERENCE WITH D. CORWIN.	0.30
01/30/25	VJR	PREPARE FOR AND CONFERENCE WITH D. SHEVITZ.	0.30
01/31/25	VJR	CONFERENCE WITH L. JURICH REGARDING STATUS AND NEXT STEPS.	0.20
01/31/25	VJR	BEGIN CONFIRMATION BRIEF.	0.80
Subtotal B320 PLAN AND DISCLOSURE STATEMENT			8.70 8,593.00



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LOS ANGELES, CA 90067
(310) 282-2000 IRS #95-1780806

MATTER # 236362-10002
INVOICE # 2559531

METROPOLITAN THEATRE CORPORATION
METROPOLITAN THEATERS BANKRUPTCY

02/10/25
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Time and Fee Summary

Timekeeper	Init	Hours	Rate	Fee Value
L JURICH	LNJ	4.40	1,000.00	4,400.00
F MCKEOWN	F M	0.20	465.00	93.00
V RUBINSTEIN	VJR	14.00	1,000.00	14,000.00
	TOTAL	18.60		18,493.00

Disbursement Detail

Date	Description of Disbursements	Amount
	ONLINE RESEARCH	37.20
	TOTAL	37.20

MATTER # 236362-10002
INVOICE # 2559531METROPOLITAN THEATRE CORPORATION
METROPOLITAN THEATERS BANKRUPTCY02/10/25
Page: 6**STATEMENT OF PRIOR OUTSTANDING INVOICES**

INVOICE NUMBER	INVOICE DATE	INVOICE AMOUNT	PAYMENTS TO DATE	INVOICE BALANCE
2511900	05/15/24	305,844.00	115,000.00	190,844.00
2513896	05/29/24	87,094.00	0.00	87,094.00
2519892	06/30/24	116,327.71	0.00	116,327.71
2525252	07/31/24	68,222.90	0.00	68,222.90
2534237	09/23/24	71,264.00	0.00	71,264.00
2540748	10/31/24	104,150.00	0.00	104,150.00
2545618	11/12/24	35,620.52	0.00	35,620.52
2550182	12/12/24	72,877.00	0.00	72,877.00
2555283	01/14/25	38,755.27	0.00	38,755.27
TOTALS		900,155.40	115,000.00	785,155.40



10100 SANTA MONICA BLVD
SUITE 2200
LOS ANGELES, CA 90067
(310) 282-2000 IRS #95-1780806

MARCH 14, 2025
INVOICE NO. 2565398

METROPOLITAN THEATRES CORPORATION
ATTENTION: DAVID CORWIN
17101 VALLEY VIEW AVE
CERRITOS, CA 90703

PAYMENT DUE UPON RECEIPT

RE: METROPOLITAN THEATERS BANKRUPTCY
OUR FILE NO: 236362-10002

FEES FOR PROFESSIONAL SERVICES RENDERED AS PER ATTACHED DETAIL	60,645.00
DISBURSEMENTS MADE FOR YOUR ACCOUNT AS PER ATTACHED DETAIL	283.97
TOTAL CURRENT AMOUNT DUE	60,928.97
OTHER OUTSTANDING INVOICES (PER ATTACHED DETAIL)	803,685.60
TOTAL AMOUNT DUE	864,614.57

PAYMENT OPTIONS

Payment by wire or ACH, please use the following:

City National Bank
2029 Century Park East
Los Angeles, CA 90067

ABA: 122016066
Account no: 210-034722
Beneficiary: Loeb & Loeb LLP – General Account
SWIFT Code: CINAUS6L

Payment by check, please remit to:

Loeb & Loeb LLP
10100 Santa Monica Blvd
Suite 2200
Los Angeles, CA 90067

** Please include as a reference client no: 236362 or invoice number 2565398
To aid in application of the payment, details should be sent to epayment@loeb.com

If our account details change, we will notify these to you by letter, phone or face-to-face and never by email.

MATTER # 236362-10002
INVOICE # 2565398

METROPOLITAN THEATRE CORPORATION
METROPOLITAN THEATERS BANKRUPTCY

03/14/25
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Date	TK	Description of Services Rendered	Hours
B110 CASE ADMINISTRATION			
02/21/25	F M	FINALIZE MONTHLY OPERATING REPORT	0.10
02/25/25	F M	FINALIZE NOTICE OF FILING OF EXHIBIT TO CORWIN DECLARATION	0.10
Subtotal B110 CASE ADMINISTRATION			0.20 93.00
B113 PLAN PREPARATION			
02/05/25	A Z	RESEARCH RESOLICITATION OF MODIFIED PLAN (.5); DISCUSS RESOLICITATION RESEARCH WITH V. RUBINSTEIN (.3)	0.80
Subtotal B113 PLAN PREPARATION			0.80 600.00
B150 MEETINGS OF AND COMMUNICATIONS WITH CREDITORS			
02/01/25	VJR	ANALYZE SANTA BARBARA COUNTER AND CORRESPOND WITH CORWIN AND HERMANN REGARDING SAME.	0.40
02/03/25	LNJ	ENGAGED AS TO REVISIONS TO LETTER TO CITY RE ADMINISTRATIVE CLAIM.	0.20
02/05/25	VJR	CORRESPOND WITH L. LANDAU REGARDING LEASE.	0.10
02/05/25	VJR	CORRESPOND WITH HERMANN REGARDING SANTA BARBARA NUMBERS. FINALIZE LETTER AND SEND TO SB COUNSEL.	0.30
02/12/25	VJR	CONFERENCE WITH D. NITCHRL (SANTA BARBARA).	0.30
02/17/25	VJR	CORRESPOND WITH SANTA BARBARA COUNSEL AND CLIENTS REGARDING SETTLEMENT PROPOSAL.	0.10
02/18/25	VJR	CONFERENCE WITH D. CORWIN (X2)(.2). CONFERENCE WITH I. GOLD AND CORRESPOND WITH I GOLD (.2). TEND TO ADMINISTRATIVE CLAIM PAYMENTS (.3), CORWIN AND FREEMAN SUPP DECLARATIONS (.2). CORRESPOND WITH UST (.1)	1.00
02/19/25	LNJ	ENGAGED AS TO ISSUES FROM CREDITOR RE NON-PAYMENT.	0.10
02/19/25	VJR	CORRESPOND WITH CORWIN AND HERMANN REGARDING SANTA BARBARA CLAIM.	0.10
02/19/25	VJR	CORRESPOND WITH HERMANN REGARDING FUZE AND MOR (.1). CONFERENCE WITH HERMANN (.1).	0.20
02/27/25	VJR	CORRESPONDENCE FROM NITSCHL AND CORRESPONDENCE TO CLARK.	0.10
Subtotal B150 MEETINGS OF AND COMMUNICATIONS WITH CREDITORS			2.90 2,900.00

B170 FEE/EMPLOYMENT OBJECTIONS

MATTER # 236362-10002
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METROPOLITAN THEATRE CORPORATION
METROPOLITAN THEATERS BANKRUPTCY

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Date	TK	Description of Services Rendered	Hours
02/23/25	LNJ	DRAFTED AND REVISE E-MAIL TO CLIENT RE ADMINISTRATIVE FEES WITH ATTACHMENTS.	0.40
Subtotal B170 FEE/EMPLOYMENT OBJECTIONS			0.40 400.00
B185 ASSUMPTION/REJECTION OF LEASES			
02/03/25	VJR	ADDITIONAL RESEARCH REGARDING STUB RENT (.3) AND PREPARE INITIAL DRAFT OF CITY LETTER AND TRANSMIT TO CORWIN AND HERMANN (1.3).	1.60
02/05/25	LNJ	E-MAIL FROM L. LANDAU RE OFFICE LEASE.	0.10
02/26/25	VJR	ANALYZE HOLDOVER RENT ISSUE AND CORRESPOND WITH CORWIN REGARDING SAME.	0.40
Subtotal B185 ASSUMPTION/REJECTION OF LEASES			2.10 2,100.00
B210 BUSINESS OPERATIONS			
02/05/25	VJR	CORRESPOND WITH M. FOUCHE AND HERMANN REGARDING INSURANCE PROOF. REVIEW AND TRANSMIT SAME.	0.20
02/21/25	VJR	CONFERENCES WITH FREEMAN AND LOMBARDO REGARDING MORS. REVIEW SAME. FORWARD EXHIBIT. CORRESPOND WITH HERMANN. TEND TO FILING.	0.80
02/21/25	VJR	CORRESPOND WITH D. CORWIN REGARDING DONLIN INVOICES.	0.10
Subtotal B210 BUSINESS OPERATIONS			1.10 1,100.00
B320 PLAN AND DISCLOSURE STATEMENT			
02/03/25	VJR	WORKING ON CONFIRMATION BRIEF (.8). EMAIL TO CORWIN AND HERMANN REGARDING DOCUMENTS FOR UPCOMING FILING (.2).	1.00
02/04/25	VJR	CORRESPOND AND CONFERENCE WITH CORWIN AND HERMANN REGARDING PLAN ISSUES (.9). DIRECT MCKEOWN REGARDING UPCOMING FILINGS (.2). WORKING ON SAME AND SCHEDULE OF FILINGS; REVIEW DOCKET (.4)	1.40
02/05/25	LNJ	REVIEWED METRO 4 LOAN PROPOSAL AND CONTINGENCIES.	0.10
02/05/25	VJR	WORKING ON EXHIBITS TO PLAN SUPPLEMENT AND CORRESPOND WITH HERMANN (X2) REGARDING SAME (.4). TEND TO FINANCING PROPOSAL AND CONFERENCE WITH CORWIN REGARDING SAME (.3).	0.70
02/06/25	LNJ	ENGAGED AS TO PLAN SUPPLEMENT ISSUES AND DRAFTING.	0.30
02/06/25	LNJ	CONFERENCE WITH V. RUBINSTEIN RE SUPPLEMENTAL FILING.	0.10

MATTER # 236362-10002
INVOICE # 2565398

METROPOLITAN THEATRE CORPORATION
METROPOLITAN THEATERS BANKRUPTCY

03/14/25
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Date	TK	Description of Services Rendered	Hours
02/06/25	VJR	FINISH DRAFT CONFIRMATION BRIEF AND TRANSMIT TO CORWIN (1.6). MAKE ADDITIONAL PLAN CHANGES AND TRANSMIT TO CORWIN (.5). CONFERENCE WITH FLAHAUT REGARDING PLAN ISSUES (.3). CORRESPOND AND CONFERENCE WITH D. CORWIN (.3). CONFERENCE WITH P. HERMANN REGARDING PLAN FILING MATERIALS (.2). CONFERENCE WITH S. FREEMAN REGARDING HIS DECLARATION AND FEASIBILITY ISSUES (.2).	3.10
02/07/25	LNJ	ENGAGED AS TO S. FREEMAN DECLARATION.	0.20
02/07/25	LNJ	ENGAGED AS TO SUPPLEMENTAL BRIEFING AND FINANCING STATUS.	0.30
02/07/25	LNJ	REVIEWED FINANCING PROPOSAL.	0.10
02/07/25	VJR	DRAFT AND REVISE CORWIN DECLARATION (2.3). CORRESPOND WITH HERMANN REGARDING SAME AND EXHIBITS TO CORWIN DECLARATION [X3] (.2). CORRESPOND WITH SHEVITZ REGARDING STATUS (.2). DRAFT FREEMAN DECLARATION AND CORRESPOND WITH HIM REGARDING SAME (.7). DRAFT AND REVISE PLAN SUPPLEMENT (.9).	4.60
02/08/25	LNJ	REVIEWED AND REVISED S. FREEMAN DECLARATION.	0.20
02/08/25	LNJ	ENGAGED AS TO BRIEFING FOR UPCOMING HEARING.	0.20
02/08/25	LNJ	E-MAIL FROM V. RUBINSTEIN RE DRAFT.	0.10
02/08/25	VJR	DRAFT LUDWICK DECLARATION (1.4). REVISE FREEMAN DECLARATION (.2) AND CORRESPOND WITH HIM REGARDING SAME. DRAFT OF SUPPLEMENTAL NOTICE (.3). DIRECT MCKEOWN REGARDING FILING (.2). TEND TO CONFIRMATION BRIEF AND CORWIN DECLARATION (.4).	2.50
02/09/25	VJR	REVISE LUDWICK DECLARATION AND TRANSMIT WITH COVER.	0.20
02/10/25	F M	DRAFT SECOND NOTICE OF SUBMISSION OF PLAN REDLINE (.4); ENGAGED IN GATHERING EXHIBITS TO PLAN SUPPLEMENT NOTICE (1.8); EMAIL TO NOTICING AGENT (.1)	2.30
02/10/25	VJR	CORRESPOND AND CONFERENCE WITH LUDWICK AND CONVERT DECLARATION INTO LETTER (.6). CORRESPOND WITH FREEMAN AND DOUG REGARDING CONFIRMATION ISSUES (.2). COORDINATING FILING WITH MCKEOWN AND DIRECT HER REGARDING SAME (.6). REVISE CORWIN DECLARATION AND CONFERENCE WITH CORWIN REGARDING SAME (.7). CORRESPOND WITH FREEMAN, CONFERENCE WITH FREEMAN AND REVISE FREEMAN DECLARATION (.9). WORKING ON CONFIRMATION BRIEF, SUPPLEMENTAL FILINGS, PLAN (2.1).	5.10
02/10/25	LNJ	ENGAGED AS TO PLAN CONFIRMATION ISSUES.	0.30

MATTER # 236362-10002
INVOICE # 2565398

METROPOLITAN THEATRE CORPORATION
METROPOLITAN THEATERS BANKRUPTCY

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Date	TK	Description of Services Rendered	Hours
02/10/25	LNJ	EMAIL FROM S. FREEMAN REGARDING CONFIRMATION HEARING.	0.10
02/10/25	LNJ	REVIEWED/REVISED S. FREEMAN DECLARATION.	0.20
02/11/25	F M	CITE CHECK AND REVIEW AND REVISE PLAN (1.3); CITE CHECK AND REVIEW AND REVISE CONFIRMATION BRIEF (1.5); PREPARE NOTICE OF FILING OF REDLINES TO PLAN (1.2); PREPARE PLAN EXHIBITS (.9); PREPARE PLAN SUPPLEMENT AND EXHIBITS (1.3); PREPARE EXHIBITS TO CORWIN DECLARATION (.9); FINALIZE FREEMAN DECLARATION (.1)	7.20
02/11/25	LNJ	ENGAGED AS TO REVISIONS TO MULTIPLE BANKRUPTCY FILINGS RE FEASIBILITY AND SUPPLEMENTAL PLAN ISSUES.	1.10
02/11/25	LNJ	REVIEWED AND REVISED S. FREEMAN DECLARATION.	0.20
02/11/25	VJR	CORRESPOND WITH CORWIN AND HERMANN REGARDING EFFECTIVE DATE ISSUES (.2). CORRESPOND WITH HERMANN AND CORWIN REGARDING FREEMAN DECLARATION (.1). NUMEROUS CALLS AND CORRESPOND WITH HERMANN AND CORWIN REGARDING PLAN, DECLARATIONS AND EXHIBITS AND ANALYZE SAME (3.3); REVISE AND FINALIZE PLAN DOCUMENTS (4.5). DIRECT MCKEOWN ON FILING AND SERVICE AND NUMEROUS CORRESPONDENCE AND CALLS REGARDING SAME (.7).	8.80
02/12/25	LNJ	ENGAGED AS TO PLAN CONFIRMATION AND FEASIBILITY ISSUES.	0.30
02/12/25	LNJ	EMAIL FROM SETH RE FEASIBILITY ISSUES.	0.10
02/13/25	LNJ	ENGAGED AS TO REQUEST BY US TRUSTEE RE ADDITIONAL INFORMATION.	0.20
02/13/25	LNJ	E-MAIL FROM V. RUBINSTEIN.	0.10
02/13/25	LNJ	E-MAIL FROM D. CORWIN RE PROJECTIONS.	0.10
02/13/25	LNJ	ENGAGED AS TO S. FREEMAN ISSUES RE PROJECTIONS.	0.10
02/13/25	VJR	CORRESPOND WITH S. FREEMAN REGARDING UST REQUEST (.2). CONFERENCE WITH CORWIN AND HERMANN (.5).	0.70
02/14/25	LNJ	ENGAGED AS TO US TRUSTEE REQUEST FOR PROJECTIONS.	0.20
02/14/25	VJR	CORRESPOND AND CONFERENCE WITH D. SHAVITZ (.5) AND CORRESPOND WITH CLIENTS REGARDING SAME.	0.50
02/16/25	LNJ	ENGAGED AS TO BANKRUPTCY PLAN UPDATE ISSUES.	0.20
02/17/25	LNJ	REVISED DRAFT OF D. CORWIN.	0.20
02/17/25	LNJ	REVISED DRAFT OF S. FREEMAN.	0.20

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Date	TK	Description of Services Rendered	Hours
02/17/25	LNJ	E-MAIL TO S. FREEMAN RE DECLARATION.	0.10
02/17/25	VJR	DRAFT CORWIN AND FREEMAN SUPPLEMENTAL DECLARATIONS (1.7). CORRESPOND WITH CORWIN AND SHEVITZ REGARDING SAME (.1).	1.80
02/18/25	LNJ	ENGAGED AS TO BANKRUPTCY PLAN ISSUES AND FEASIBILITY.	0.20
02/19/25	LNJ	ENGAGED AS TO STATUS OF OBJECTIONS AND STATUS OF APPRAISAL.	0.10
02/19/25	LNJ	ENGAGED AS TO RE-FINANCING.	0.10
02/19/25	LNJ	CONFERENCE WITH V. RUBINSTEIN RE HEARING AND CONFERENCE ORDER.	0.10
02/19/25	LNJ	ENGAGED AS TO PLAN CONFIRMATION ORDER AND FINDINGS.	0.40
02/19/25	VJR	REVISE CORWIN DECLARATION (X2) AND CORRESPOND WITH HIM REGARDING SAME (.5). REVISE FREEMAN DECLARATION AND CORRESPOND WITH HIM REGARDING SAME (.3). CORRESPOND WITH UST.	0.90
02/20/25	F M	FINALIZE CORWIN DECLARATION (.3); FINALIZE FREEMAN DECLARATION (.5)	0.50
02/20/25	LNJ	CONFERENCE WITH D. CORWIN RE PLAN CONFIRMATION ISSUES, STRATEGY AND STATUS OF NEW LOAN.	0.30
02/20/25	LNJ	ENGAGED AS TO FILING RE S. FREEMAN DECLARATION RE CONFIRMATION.	0.20
02/20/25	LNJ	ENGAGED AS TO ISSUES RE PLAN CONFIRMATION.	0.30
02/20/25	LNJ	ENGAGED AS TO D. CORWIN DECLARATION FILING.	0.10
02/20/25	VJR	CORRESPOND WITH SHEVITZ REGARDING CORWIN SUPPLEMENTAL DECLARATION (X2)(.2). CORRESPOND WITH CORWIN REGARDING SAME (.2). REVISE DECLARATION AND SEND TO SHEVITZ (.5). MAKE FURTHER CHANGES AND CORRESPOND WITH CORWIN REGARDING SAME (.2). CONFERENCE WITH D. CORWIN (.4). CORRESPOND WITH FREEMAN (.1). COORDINATE FILING AND SERVICE OF SUPPLEMENTAL DECLARATIONS (.1).	1.70
02/21/25	LNJ	E-MAIL FROM D. CORWIN RE PAYMENT OF DONLIN AND ADMINISTRATIVE CLAIMS.	0.10
02/21/25	LNJ	ENGAGED AS TO V. RUBINSTEIN RE CONFIRMATION ORDER AND BRIEFING.	0.30
02/21/25	VJR	DRAFTING CONFIRMATION ORDER (1.2). CONFERENCE WITH L. JURICH REGARDING CONFIRMATION (.2).	1.40

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Date	TK	Description of Services Rendered	Hours
02/22/25	LNJ	ENGAGED AS TO RESPONSES TO CLIENT QUESTIONS TO ADMINISTRATIVE FEE ISSUES AND QUESTIONS.	0.30
02/23/25	LNJ	ENGAGED AS TO PRE-CONFIRMATION ISSUES.	0.50
02/23/25	VJR	DRAFTING CONFIRMATION ORDER [1]. CONFERENCE WITH L. JURICH.	1.20
02/25/25	VJR	CONFERENCE WITH DAVID AND PHIL REGARDING PLAN ISSUES.	0.30
02/25/25	LNJ	ENGAGED AS TO EXHIBITS FOR CONFIRMATION AND FILING.	0.20
02/26/25	VJR	TEND TO CONFIRMATION HEARING BINDER AND COURT COPY. CALL AEGON COUNSEL.	0.30
02/27/25	F M	ASSIST ATTORNEYS PREPARE FOR CONFIRMATION HEARING (.4); PREPARE HEARING BINDERS (2.4)	2.80
02/27/25	VJR	WORKING ON CONFIRMATION ORDER (.8). TEND TO JUDGE'S HEARING BINDER [.4].	1.20
02/28/25	VJR	CONFERENCE WITH L. JURICH REGARDING CONFIRMATION (.1). DRAFTING CONFIRMATION ORDER (.9). CORRESPOND WITH CHAMBERS (.1). CORRESPOND WITH S. LUDWICK (.2). CORRESPOND WITH D. NIRSCHL (.1). CORRESPOND WITH AEGON COUNSEL.	1.50
02/28/25	LNJ	EMAIL TO S. FREEMAN REGARDING ZOOM APPEARANCE RATHER THAN IN PERSON.	0.10
Subtotal B320 PLAN AND DISCLOSURE STATEMENT			60.30 53,452.00

Time and Fee Summary

Timekeeper	Init	Hours	Rate	Fee Value
L JURICH	LNJ	9.40	1,000.00	9,400.00
F MCKEOWN	F M	13.00	465.00	6,045.00
V RUBINSTEIN	VJR	44.60	1,000.00	44,600.00
A ZOBEIDEH	A Z	0.80	750.00	600.00
TOTAL		67.80		60,645.00

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Page: 8**Disbursement Detail**

Date	Description of Disbursements	Amount
02/27/25	VENDOR: IDISCOVER, LLC - INV# 101256 INV DATE 02/28/25 LITIGATION SUPPORT VENDORS - REQUESTED BY: FIONA MCKEOWN JOB DESCRIPTION: BLOWBACKS X3 975 PRINTING (BLOWBACKS) WITH ASSEMBLY 54 TABS 6 PRINTING (BLOWBACKS) " COLOR 3 BINDERS " 1"	183.27
02/28/25	VENDOR: NATIONWIDE LEGAL, LLC - INV# 83438 INV DATE 02/28/25 DELIVERY SERVICES/MESSENGERS - REQUESTED BY: LANCE JURICH REF: LA620073 USBC/LOS ANGELES/CENTRAL DISTRICT OF CA; DELIVER COURTESY COPY ASAP HON. RUSSELL // COURT ROOM 1668	100.70
TOTAL		283.97

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METROPOLITAN THEATERS BANKRUPTCY03/14/25
Page: 9**STATEMENT OF PRIOR OUTSTANDING INVOICES**

INVOICE NUMBER	INVOICE DATE	INVOICE AMOUNT	PAYMENTS TO DATE	INVOICE BALANCE
2511900	05/15/24	305,844.00	115,000.00	190,844.00
2513896	05/29/24	87,094.00	0.00	87,094.00
2519892	06/30/24	116,327.71	0.00	116,327.71
2525252	07/31/24	68,222.90	0.00	68,222.90
2534237	09/23/24	71,264.00	0.00	71,264.00
2540748	10/31/24	104,150.00	0.00	104,150.00
2545618	11/12/24	35,620.52	0.00	35,620.52
2550182	12/12/24	72,877.00	0.00	72,877.00
2555283	01/14/25	38,755.27	0.00	38,755.27
2559531	02/10/25	18,530.20	0.00	18,530.20
TOTALS		918,685.60	115,000.00	803,685.60



10100 SANTA MONICA BLVD
SUITE 2200
LOS ANGELES, CA 90067
(310) 282-2000 IRS #95-1780806

APRIL 16, 2025
INVOICE NO. 2574190

METROPOLITAN THEATRES CORPORATION
ATTENTION: DAVID CORWIN
17101 VALLEY VIEW AVE
CERRITOS, CA 90703

PAYMENT DUE UPON RECEIPT

RE: METROPOLITAN THEATERS BANKRUPTCY
OUR FILE NO: 236362-10002

FEES FOR PROFESSIONAL SERVICES RENDERED AS PER ATTACHED DETAIL	26,125.50
TOTAL CURRENT AMOUNT DUE	26,125.50
OTHER OUTSTANDING INVOICES (PER ATTACHED DETAIL)	291,091.44
TOTAL AMOUNT DUE	317,216.94

PAYMENT OPTIONS

Payment by wire or ACH, please use the following:

City National Bank
2029 Century Park East
Los Angeles, CA 90067

ABA: 122016066
Account no: 210-034722
Beneficiary: Loeb & Loeb LLP – General Account
SWIFT Code: CINAUS6L

Payment by check, please remit to:

Loeb & Loeb LLP
10100 Santa Monica Blvd
Suite 2200
Los Angeles, CA 90067

** Please include as a reference client no: 236362 or invoice number 2574190
To aid in application of the payment, details should be sent to epayment@loeb.com

If our account details change, we will notify these to you by letter, phone or face-to-face and never by email.

MATTER # 236362-10002
INVOICE # 2574190METROPOLITAN THEATRE CORPORATION
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Date	TK	Description of Services Rendered	Hours
B110 CASE ADMINISTRATION			
03/31/25	F M	FINALIZE MONTHLY OPERATING REPORT	0.10
Subtotal B110 CASE ADMINISTRATION			0.10 46.50
B160 FEE/EMPLOYMENT APPLICATIONS			
03/06/25	LNJ	ENGAGED AS TO PROFESSION FEE APPLICATION STATUS AND LOCAL RULES.	0.20
03/14/25	LNJ	ENGAGED AS TO FEE APPLICATION ISSUE AND E-MAIL DRAFT TO D. CORWIN.	0.20
03/22/25	LNJ	E-MAIL TO D. CORWIN RE FEE APPLICATION.	0.10
Subtotal B160 FEE/EMPLOYMENT APPLICATIONS			0.50 500.00
B185 ASSUMPTION/REJECTION OF LEASES			
03/18/25	VJR	PREPARE FOR AND ATTEND STATUS CONFERENCE (.3). FINALIZE PROPOSED CONFIRMATION ORDER AND COORDINATE LODGING OF SAME (.6).	0.90
03/19/25	VJR	CONFERENCE WITH D. CORWIN REGARDING LEASE AND EFFECTIVE DAY ISSUES.	0.40
03/22/25	LNJ	E-MAIL TO L. LANDAU RE STATUS OF AMENDED LEASE (DRAFT).	0.20
03/24/25	LNJ	E-MAIL TO L. LANDAU.	0.10
03/24/25	LNJ	E-MAIL FROM L. LANDAU.	0.10
03/24/25	LNJ	CONFERENCE WITH V. RUBINSTEIN RE OFFICE LEASE.	0.10
03/25/25	LNJ	ENGAGED AS TO L. LANDAU ISSUES AND CALL WITH V. RUBINSTEIN.	0.10
03/31/25	VJR	CORRESPOND WITH CORWIN (.1). REVIEW LEASE (.1). CONFERENCE WITH SMILEY (.2). CONFERENCE WITH CORWIN (.1). CORRESPOND WITH CORWIN (.1). CORRESPOND WITH BURKHART AND CONFERENCE WITH HIM REGARDING AMENDMENT (.3). CORRESPOND WITH CORWIN (.1).	1.00
Subtotal B185 ASSUMPTION/REJECTION OF LEASES			2.90 2,900.00
B210 BUSINESS OPERATIONS			
03/29/25	VJR	REVIEW MOR AND INSTRUCT MCKEOWN ON FILING.	0.10
Subtotal B210 BUSINESS OPERATIONS			0.10 100.00
B310 CLAIMS ADMINISTRATION AND OBJECTIONS			



10100 SANTA MONICA BLVD
SUITE 2200
LOS ANGELES, CA 90067
(310) 282-2000 IRS #95-1780806

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Date	TK	Description of Services Rendered	Hours
03/12/25	LNJ	REVIEWED AEGIS ISSUES RE FEES.	0.10
03/26/25	LNJ	CONFERENCE WITH CITY RE TAX.	0.10
03/26/25	LNJ	E-MAIL FROM CITY RE TAX CLAIM.	0.10
Subtotal B310 CLAIMS ADMINISTRATION AND OBJECTIONS			0.30 300.00

B320 PLAN AND DISCLOSURE STATEMENT

03/03/25	LNJ	DRAFTED AND REVISE E-MAIL TO D. CORWIN.	0.20
03/03/25	LNJ	E-MAIL FROM D. CORWIN RE LOEB FEES.	0.10
03/03/25	LNJ	E-MAIL FROM V. RUBINSTEIN RE PLAN PAYMENTS.	0.10
03/03/25	LNJ	REVIEWED PAYOFF DEMAND FROM AEGIS.	0.10
03/03/25	LNJ	ENGAGED AS TO PREPARATION FOR CONFIRMATION HEARING WITH V. RUBINSTEIN.	0.50
03/03/25	VJR	CONFERENCE WITH D. NIRSCHL REGARDING CITY CLAIM (.2). CONFERENCE WITH D. CORWIN REGARDING CONFIRMATION ISSUES (.5). SEVERAL CORRESPONDENCE WITH LUDWICK. (.2). PREPARING FOR CONFIRMATION HEARING (.4).	1.30
03/04/25	LNJ	ENGAGED AS TO REVISING V. RUBINSTEIN PRESENTATION FOR CONFIRMATION.	0.40
03/04/25	LNJ	E-MAIL TO V. RUBINSTEIN RE COMMENTS.	0.10
03/04/25	LNJ	ENGAGED AS TO HEARING FOR CONFIRMATION.	0.50
03/04/25	VJR	CORRESPOND WITH AEGON COUNSEL (.1). PREPARE FOR CONFIRMATION HEARING (1.5). CORRESPOND WITH LUDWICK (.1). ATTEND CONFIRMATION HEARING (.8).	2.50
03/05/25	LNJ	ENGAGED AS TO ISSUES RE CALENDARING, FUTURE STATUS CONFERENCE AND PAYMENTS TO ADMINISTRATIVE CREDITORS.	0.20
03/05/25	VJR	CORRESPOND WITH P. HERMAN REGARDING CONFIRMATION. ISSUES (.1). TEND TO ISSUES NEEDED FOR CONFIRMATION ORDER ENTRY (.2).	0.10
03/06/25	LNJ	ENGAGED AS TO CONFIRMATION DECLARATION AND EFFECTIVE DATE NOTICE.	0.20
03/06/25	VJR	CORRESPOND WITH CORWIN REGARDING CITY SETTLEMENT PROPOSAL (.2). CORRESPOND WITH MORTGAGE BROKER (.1). WORKING ON CONFIRMATION ORDER (.8).	1.10

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METROPOLITAN THEATRE CORPORATION
 METROPOLITAN THEATERS BANKRUPTCY

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Date	TK	Description of Services Rendered	Hours
03/07/25	LNJ	ENGAGED AS TO ISSUES RE CONFIRMATION AND STATUS OF NEW LOAN.	0.20
03/07/25	LNJ	CONFERENCE WITH V. RUBINSTEIN RE FILINGS.	0.10
03/08/25	LNJ	E-MAIL TO V. RUBINSTEIN RE CORWIN QUESTIONS RE CITY OF SB AND CREDITOR TIMING RE PAYMENT.	0.10
03/10/25	LNJ	REVIEWED AND REVISED V. RUBINSTEIN E-MAIL.	0.10
03/10/25	LNJ	ENGAGED AS TO CONFIRMATION AND EFFECTIVE DATE ISSUES.	0.30
03/10/25	VJR	CORRESPOND WITH D. CORWIN REGARDING HIS QUESTIONS (.2). CORRESPOND WITH I. GOLD.	0.30
03/11/25	F M	FINALIZE CORWIN DECLARATION	0.10
03/11/25	LNJ	REVISED D. CORWIN DECLARATION RE CONFIRMATION.	0.20
03/11/25	VJR	DRAFT AND REVISE CORWIN DECLARATION REGARDING FINANCING (.6). CORRESPOND WITH D. CORWIN (.1). COORDINATE FILING AND SERVICE (.1). WORKING ON CONFIRMATION ORDER (.7).	1.50
03/12/25	VJR	CORRESPOND WITH D. CORWIN REGARDING AEGON AND BROWNSTEIN [.1 AT 3:50]	0.10
03/13/25	VJR	CORRESPOND WITH FLAHAUT AND SHEVITZ (.1). CONFERENCE WITH FLAHAUT (.3). CORRESPOND WITH CORWIN [SEVERAL (.3). FINALIZE FIRST DRAFT OF CONFIRMATION ORDER (.3).	1.00
03/14/25	F M	FINALIZE SUPPLEMENTAL CORWIN DECLARATION	0.10
03/14/25	LNJ	ENGAGED AS TO AEGIS NEGOTIATION AND ISSUES RE FINANCING FOR PLAN.	0.20
03/14/25	VJR	CORRESPOND WITH D. CORWIN REGARDING CONFIRMATION ORDER AND REVISE SAME PER HIS COMMENTS (.4). MAKE FURTHER CHANGES (.3). DISTRIBUTE TO SEVERAL COUNSEL (.2). CORRESPONDENCE FROM PASEO COUNSEL AND CORRESPOND WITH CORWIN REGARDING SAME (.2). DRAFT CORWIN DECLARATION (.3) AND CORRESPOND WITH D. CORWIN (.1). COORDINATE FILING AND SERVICE (.1).	1.30
03/14/25	VJR	CONFERENCE WITH AEGON REGARDING CLOSING ISSUES (.4). CONFERENCE WITH D. CORWIN REGARDING SAME (.1)	0.50
03/15/25	VJR	EMAIL TO CLIENT REGARDING EFFECTIVE DATE PAYMENTS.	0.20
03/16/25	VJR	WORKING ON CONFIRMATION ORDER (.7) AND EFFECTIVE DATE NOTICE (.8). CORRESPOND WITH I. GOLD (.2) CORRESPOND WITH PASEO COUNSEL (.1).	1.80

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 METROPOLITAN THEATERS BANKRUPTCY

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Date	TK	Description of Services Rendered	Hours
03/17/25	LNJ	REVISED EFFECTIVE DATE NOTICE.	0.20
03/17/25	LNJ	ENGAGED AS TO ISSUES RE HEARING RE STATUS CONFERENCE.	0.10
03/17/25	LNJ	CONFERENCE WITH V. RUBINSTEIN RE STATUS CONFERENCE.	0.10
03/17/25	VJR	CORRESPOND WITH COUNSEL FOR DISNEY (.1). CORRESPOND WITH COURT REGARDING APPEARANCE (.1). CORRESPOND WITH D. CORWIN (.1). FINALIZE EFFECTIVE DATE NOTICE DRAFT (.3) AND CIRCULATE TO UST AND SUB V TRUSTEE (.2)	0.80
03/18/25	LNJ	ENGAGED AS TO CONFIRMATION ORDER AND LODGMENT.	0.10
03/19/25	LNJ	ENGAGED AS TO CONFIRMATION ORDER AND FILING.	0.10
03/21/25	LNJ	REVIEWED CONFIRMATION ORDER (SIGNED).	0.10
03/21/25	LNJ	E-MAIL FROM SUBCHAPTER 5 TRUSTEE.	0.10
03/21/25	LNJ	E-MAIL TO D. CORWIN RE CONFIRMATION ORDER AND ISSUES.	0.10
03/21/25	VJR	REVIEW AND REVISE SB CITY SETTLEMENT STIPULATION (.7). CORRESPOND WITH D. CORWIN REGARDING SAME AND PLAN ISSUES(.1). CORRESPOND WITH NIRTSCHL (COUNSEL) (.1)	0.90
03/22/25	LNJ	E-MAIL TO V. RUBINSTEIN RE EFFECTIVE DATE AND DRAFT.	0.20
03/24/25	VJR	CONFERENCE WITH CORWIN AND HERMAN REGARDING EFFECTIVE DATE ISSUES.	0.30
03/25/25	F M	FINALIZE PROOF OF SERVICE	0.10
03/25/25	VJR	CONFERENCE WITH CORWIN AND HERMAN (.5). CONFERENCE WITH JURICH (.1). CORRESPOND WITH E. BURKHART,	0.80
03/26/25	LNJ	CONFERENCE WITH D. CORWIN AND P. HERRMAN RE EFFECTIVE DATE PAYMENTS.	0.10
03/26/25	VJR	TEND TO EFFECTIVE DATE ISSUES (.2). CORRESPOND WITH NRISCHL AND REVIEW CITY AGREEMENT (.3). CONFERENCE WITH CORWIN AND HERMANN (.8).	1.30
03/27/25	VJR	DRAFT AND REVISE COVER LETTER FOR ASSUMPTION CHECKS. CORRESPOND WITH D. CORWIN REGARDING NATIONAL CINEMEDIA AND REVIEW PLAN AND CONFIRMATION ORDER REGARDING SAME.	0.50
03/28/25	LNJ	E-MAIL TO CLIENT RE EFFECTIVE DATE PAYMENTS.	0.20
03/28/25	VJR	CONFERENCE WITH CITY COUNSEL (.3) AND D. CORWIN REGARDING SAME (.2). CORRESPOND REGARDING IB (.2).	0.70

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Date	TK	Description of Services Rendered	Hours
03/31/25	F M	REVISE EFFECTIVE NOTICE (.1); EMAILS TO NOTICING AGENT REGARDING SERVICE (.2)	0.30
Subtotal B320 PLAN AND DISCLOSURE STATEMENT			22.60 22,279.00

Time and Fee Summary

Timekeeper	Init	Hours	Rate	Fee Value
L JURICH	LNJ	6.40	1,000.00	6,400.00
F MCKEOWN	F M	0.70	465.00	325.50
V RUBINSTEIN	VJR	19.40	1,000.00	19,400.00
TOTAL		26.50		26,125.50

MATTER # 236362-10002
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Page: 7**STATEMENT OF PRIOR OUTSTANDING INVOICES**

INVOICE NUMBER	INVOICE DATE	INVOICE AMOUNT	PAYMENTS TO DATE	INVOICE BALANCE
2540748	10/31/24	104,150.00	39,770.52	64,379.48
2545618	11/12/24	35,620.52	0.00	35,620.52
2550182	12/12/24	72,877.00	0.00	72,877.00
2555283	01/14/25	38,755.27	0.00	38,755.27
2559531	02/10/25	18,530.20	0.00	18,530.20
2565398	03/14/25	60,928.97	0.00	60,928.97
TOTALS		330,861.96	39,770.52	291,091.44

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
10100 Santa Monica Blvd., Suite 2200, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): SECOND INTERIM AND FINAL FEE APPLICATION OF LOEB & LOEB LLP

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 5/1/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Dustin P Branch, branchd@ballardspahr.com; carolod@ballardspahr.com; hubenb@ballardspahr.com
- Larry Butler, notices@becket-lee.com
- James B Clark, jclark@oconnorcochran.com; JBC@lawyer.com
- Richard T Egger, richard.egger@bbklaw.com
- M Douglas Flahaut (TR), df@echoparklegal.com; C194@ecfcbis.com
- Evelina Gentry, evelina.gentry@akerman.com, rob.diwa@akerman.com; reyko.delpino@akerman.com
- Everett L Green (UST), everett.l.green@usdoj.gov
- Carissa N Horowitz, carissa@beallandburkhardt.com artyc@aol.com; castlesb@aol.com
- Lewis R Landau, Lew@Landaunet.com
- Ron Maroko (UST), ron.maroko@usdoj.gov
- Dustin Nirschl, dustin.nirschl@bbklaw.com; linda.tapia@bbklaw.com; wilma.escalante@bbklaw.com
- David Samuel Shevitz, United States Trustee (LA), David.S.Shevitz@usdoj.gov
- Felicita A Torres, torres@g-tlaw.com
- United States Trustee (LA), ustpreion16.la.ecf@usdoj.gov
- Nahal Zarnighian, zarnighiann@ballardspahr.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) 5/1/2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

ECHO PARK LEGAL, APC
M. DOUGLAS FLAHAUT, ESQ.
THE SUBCHAPTER V TRUSTEE
2210 W. SUNSET BLVD. #301
LOS ANGELES, CA 90026

OFFICE OF THE US TRUSTEE
RON MAROKO
915 WILSHIRE BLVD., STE 1850
LOS ANGELES, CA 90018

OFFICE OF THE US TRUSTEE
EVERETT L GREEN; DAVID SHEVITZ
3801 UNIVERSITY AVENUE, STE 720
RIVERSIDE, CA 92501

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3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

5/1/2025

Date

Fiona McKeown

Printed Name

/s/ Fiona McKeown

Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

LOEB & LOEB LLP
LANCE N. JURICH (SBN 132695)
ljurich@loeb.com
10100 Santa Monica Blvd.
Suite 2200
Los Angeles, CA 90067
Telephone: 310.282.2000
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345 Park Avenue
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Telephone: 212.407.4000
Facsimile: 212.407.4990

Attorneys for Reorganized Debtor
METROPOLITAN THEATRES CORPORATION, a
California corporation

UNITED STATES BANKRUPTCY COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION

In re:

METROPOLITAN THEATRES
CORPORATION, a California corporation,

Debtor.

TAX ID.: 95-1002289

Case No. 2:24-bk-11569-BR

Chapter 11 (Subchapter V)

**DECLARATION OF LANCE N. JURICH
IN SUPPORT OF SECOND INTERIM
AND FINAL APPLICATION OF LOEB &
LOEB LLP FOR APPROVAL OF FEES
AND REIMBURSEMENT OF EXPENSES
FOR THE (I) INTERIM PERIOD FROM
NOVEMBER 1, 2024 THROUGH
MARCH 31, 2025 AND (II) FINAL
PERIOD FROM FEBRUARY 29, 2024
THROUGH MARCH 31, 2025**

Hearing:

Date: June 3, 2025

Time: 10:00 a.m..

Courtroom: Courtroom 1668
255 East Temple St.
Los Angeles, CA 90012

DECLARATION OF LANCE N. JURICH

I, Lance N. Jurich, declare as follows:

1. I am an attorney at law duly licensed to practice before all courts of the State of California, the Ninth Circuit and the United States District Courts for the Central, Eastern, Northern and Southern Districts of California. I am a partner in the law firm of Loeb & Loeb LLP ("**Loeb**"), counsel for the above-captioned debtor (the "**Debtor**") in the above-captioned Chapter 11 Subchapter V bankruptcy case. I am also the Chair of Loeb's Bankruptcy Department and practice primarily in the area of bankruptcy law. The following is of my own personal knowledge, and if called as a witness, I would competently testify to the following:

2. I make this Declaration in support of the *Second Interim and Final Fee Application of Loeb & Loeb LLP for Approval of Fees and Reimbursement of Expenses* (the "**Application**"). Unless otherwise defined, all capitalized terms used herein have the meanings ascribed thereto in the Application.

3. I am familiar with Local Bankruptcy Rule 2016-1. To the best of my knowledge, information and belief, all of the matters stated in the Application are true and correct, and the Application complies with all applicable statutes, rules, regulations and procedures, including Local Bankruptcy Rule 2016-1.

4. The amounts requested in the Application for compensation of fees and reimbursement of expenses incurred are based on Loeb's business records which are kept and maintained by Loeb in the ordinary course of Loeb's business.

5. The compensation requested in the Application reflects a voluntary reduction of over 25% by Loeb of my and Mr. Rubinstein's standard hourly fees for the interim compensation period from November 1, 2024 through March 31, 2025 ("**Second Interim Period**"), as well as an additional write-off of \$2,740.50 in fees for that period. By reducing my rate and Mr. Rubinstein's rate, and not seeking allowance of \$46,076.50 in fees, Loeb has effectively granted the estate a voluntary reduction of its fees for the Second Interim Period of approximately 18%.

6. Furthermore, when taking into account of the voluntary reduction to which Loeb agreed with the U.S. Trustee during the First Interim Period of \$15,000, plus an additional voluntary

1 reduction of \$73,224, Loeb's decision to grant a further voluntary reduction of \$45,000 for the
2 Employment Period plus the reductions set forth in paragraph 5 above, Loeb has effectively granted
3 the estate a voluntary reduction of its fees for the entire Employment Period of over 20%.

4 7. Attached to the Application as **Exhibit "A"** is a summary of fees and time by
5 professional, which includes a list of the hourly billing rates of Loeb's professionals and also
6 includes the rates/discounted rates and amounts/discounted amounts billed by each professional by
7 task category. I believe the time spent is reasonable and believe the fees sought to be reasonable.

8 8. Attached to the Application as **Exhibit "B"** is a summary of costs and expenses
9 incurred. Specific descriptions of expenses incurred during the Interim Fee Application period are
10 included with the detailed description of services rendered by Loeb to the Debtor attached to the
11 Application as **Exhibit "D"**.

12 9. Attached to the Application as **Exhibit "C"** are biographies of the professionals who
13 performed the services for which compensation is requested pursuant to the Applications.
14

15 I declare under penalty of perjury under the laws of the United States of America and the
16 State of California that the foregoing is true and correct.
17

18 Executed this 1st day of May, 2025, at Los Angeles, California.
19

20
21 /s/ Lance N. Jurich
22 Lance N. Jurich
23
24
25
26
27
28

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
10100 Santa Monica Blvd., Suite 2200, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): DECLARATION OF LANCE JURICH IN SPPORT
OF SECOND INTERIM AND FINAL FEE APPLICATION OF LOEB & LOEB LLP

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 5/1/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Dustin P Branch, branchd@ballardspahr.com; carolod@ballardspahr.com; hubenb@ballardspahr.com
- Larry Butler, notices@becket-lee.com
- James B Clark, jclark@oconnorcochran.com; JBC@lawyer.com
- Richard T Egger, richard.egger@bbklaw.com
- M Douglas Flahaut (TR), df@echoparklegal.com; C194@ecfcbis.com
- Evelina Gentry, evelina.gentry@akerman.com, rob.diwa@akerman.com; reyko.delpino@akerman.com
- Everett L Green (UST), everett.l.green@usdoj.gov
- Carissa N Horowitz, carissa@beallandburkhardt.com artyc@aol.com; castlesb@aol.com
- Lewis R Landau, Lew@Landaunet.com
- Ron Maroko (UST), ron.maroko@usdoj.gov
- Dustin Nirschl, dustin.nirschl@bbklaw.com; linda.tapia@bbklaw.com; wilma.escalante@bbklaw.com
- David Samuel Shevitz, United States Trustee (LA), David.S.Shevitz@usdoj.gov
- Felicita A Torres, torres@g-tlaw.com
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☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

5/1/2025

Date

Fiona McKeown

Printed Name

/s/ Fiona McKeown

Signature