

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
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In re: Chapter 11
CINEMEX HOLDINGS USA, INC., Case No. 20-14696-LMI
Reorganized Debtor. (Formerly Jointly Administered Under
Lead Case: Cinemex USA Real Estate
Holdings, Inc., Case No. 20-14695-
LMI)

**FOURTH JOINT MOTION REQUESTING AN EXTENSION OF
TIME FOR USEF HCG FENTON LLC TO FILE A RESPONSE
TO THE OBJECTION TO CLAIM NOS. 26 AND 36 OF
USEF HCG FENTON LLC**

Cinemex Holdings USA, Inc. (“Cinemex” or the “Reorganized Debtor”) and USEF HCG Fenton LLC (“Fenton,” and together with the Reorganized Debtor, the “Parties”) file this Fourth Joint Motion Requesting an Extension of Time for USEF HCG Fenton LLC to File a Response to the Objection to Claim Nos. 26 and 36 of USEF HCG Fenton LLC (the “Fourth Joint Motion”) and state as follows:

1. On July 3, 2020, Fenton filed two proofs of claim with the Court: Proof of Claim no. 26 filed in Case No. 20-14696, and Proof of Claim no. 36 filed in Case No. 20-14699 (together, “Proofs of Claim”).
2. On June 23, 2021, Cinemex filed an Objection to Claim Nos. 26 and 36 of Fenton (ECF No. 179) (the “Objection”).
3. The deadline for Fenton to file a response to the Objection was July 23, 2021 (the “First Objection Deadline”).

4. On July 23, 2021, the Parties filed Joint Motion Requesting an Extension of Time for USEF HCG Fenton LLC to File a Response to the Objection to Claim Nos. 26 and 36 of USEF HCG Fenton LLC (ECF No. 198).

5. On July 23, 2021, the Court entered an Agreed Order Granting Joint Motion Requesting an Extension of Time for USEF HCG Fenton LLC to File a Response to the Objection to Claim Nos. 26 and 36 of USEF HCG Fenton LLC (ECF No. 200), setting the new objection deadline as August 6, 2021 (the “Second Objection Deadline”).

6. On August 6, 2021, the Parties filed Second Joint Motion Requesting an Extension of Time for USEF HCG Fenton LLC to File a Response to the Objection to Claim Nos. 26 and 36 of USEF HCG Fenton LLC (ECF No. 222).

7. On August 11, 2021, the Court entered an Agreed Order Granting the Second Joint Motion Requesting an Extension of Time for USEF HCG Fenton LLC to File a Response to the Objection to Claim Nos. 26 and 36 of USEF HCG Fenton LLC (ECF No. 233), setting the new objection deadline as August 20, 2021 (the “Third Objection Deadline”).

8. On August 20, 2021, the Parties filed Third Joint Motion Requesting an Extension of Time for USEF HCG Fenton LLC to File a Response to the Objection to Claim Nos. 26 and 36 of USEF HCG Fenton LLC (ECF No. 227).

9. On August 30, 2021, the Court entered an Agreed Order Granting the Third Joint Motion Requesting an Extension of Time for USEF HCG Fenton LLC to File a Response to the Objection to Claim Nos. 26 and 36 of USEF HCG Fenton LLC (ECF No. 229), setting the new objection deadline as September 3, 2021 (the “Fourth Objection Deadline”).

10. The Parties are still in the process of resolving the Reorganized Debtor’s Objection.

11. The Parties agree to extend the Fourth Objection Deadline for Fenton to and including September 17, 2021.

12. This extension is without prejudice to further written extensions as may be agreed upon by the Parties.

WHEREFORE, the Reorganized Debtor and Fenton respectfully request entry of an order granting the Fourth Joint Motion and extending the deadline for Fenton to file a response to the Objection to and including September 17, 2021.

Respectfully submitted this 3rd day of September, 2021.

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
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In re:

Chapter 11

CINEMEX HOLDINGS USA,
INC.,

Case No. 20-14696-LMI

Reorganized Debtor.

(Formerly Jointly Administered Under
Lead Case: Cinemex USA Real Estate
Holdings, Inc., Case No. 20-14695-
LMI)

_____/

**AGREED ORDER GRANTING THE FOURTH JOINT MOTION REQUESTING
AN EXTENSION OF TIME FOR USEF HCG FENTON LLC TO FILE
A RESPONSE TO THE OBJECTION TO CLAIM NOS. 26 AND 36 OF
USEF HCG FENTON LLC (ECF NO. ____)**

THIS MATTER came before the Court without a hearing upon the Fourth Joint Motion Requesting an Extension of Time for USEF HCG Fenton LLC to File a Response to the Objection to Claim Nos. 26 and 36 of USEF HCG Fenton LLC (ECF No. ____) (the “Fourth Joint Motion”). Based on the agreement of the Parties, and good cause appearing,

It is ordered that:

1. The Fourth Joint Motion is GRANTED.
2. The deadline for USEF HCG Fenton LLC to file a response to the Objection to Claim Nos. 26 and 36 of USEF HCG Fenton LLC is September 17, 2021.
3. The extension is without prejudice to further written extension as may be agreed upon by the Parties.

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Agreed to and submitted by:

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Copies to:

Attorney Patricia B. Tomasco, who shall serve interested parties and file a certificate of service reflecting same.