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July 25, 2022

*BY E-MAIL*

jelenakordic.os@gmail.com

Ms. Jelena Kordić, dipl.iur.  
Eugena Kvaternika 44a,  
31220 Višnjevac

Re: Adria MM Productions, Ltd

Dear Ms. Kordić:

We refer to our report of December 2021 for a summary of the proceedings before that date.

We are waiting for the bankruptcy court to respond to our renewed motion to lift the automatic bankruptcy stay solely for the purpose of proceeding in the Court of Appeals without facing the Court of Appeals' refusal to allow the appeal to be split into stayed and unstayed claims, even though that is the rule. Our renewed motion seeks to retain the bankruptcy stay on all attempts to enforce the judgment against Adria. As for Adria's judgment against Worldwide, there is an undertaking posted on appeal that provides security for that judgment. The bankruptcy judge suggested this motion, or a stipulation between the parties which Worldwide would not agree to, so we expect the bankruptcy court to grant our motion.

We have prepared a motion to file in the Court of Appeals to lift the Court of Appeals' stay of the appeal based on the bankruptcy court order, so that we can file that motion immediately upon issuance of the bankruptcy court order. We expect the appellate court to act fast on that motion and to set a briefing schedule requiring briefs to be filed within a few months. The record on appeal has already been filed.

I apologize for my recent trial schedules, which have interfered with my getting a report to you. Please feel free to ask any questions you may have. I am sending this to you in both pdf and Word format in case that is convenient.

Thank you.

Ms. Jelena Kordić, dipl.iur.  
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Sincerely,

*s/ Carolyn Shields*

Carolyn Shields

cc by email:

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