

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

)	
In re:)	Chapter 11
)	
SPORTS AUTHORITY HOLDINGS, INC., <i>et al.</i> , ¹)	Case No. 16-10527 (MFW)
)	
Debtors.)	(Jointly Administered)
)	
)	RE: D.I. 9, 15, 20 & 644

JOINDER OF MIDLAND RADIO CORPORATION TO THE OMNIBUS OBJECTION OF ASICS AMERICA CORPORATION TO DEBTORS' MOTIONS FOR ORDERS ON THE (1) CONSIGNMENT MOTION; (2) GOB MOTION; AND (3) DIP MOTION

Midland Radio Corporation ("Midland") hereby joins in and adopts as its own the legal and factual arguments (the "Joinder"), to the extent applicable (excluding the allegations therein relating to the specific prepetition termination of the agreement), made in the Omnibus Objection [D.I. 644] of ASICS America Corporation to the following motions filed by Sports Authority Holdings, Inc. and its affiliated debtors and debtors in possession:

- A. *Debtors' Motion for Interim and Final Orders (A) Authorizing the Debtors to (I) Continue to Sell Consigned Goods in the Ordinary Course of Business Free and Clear of all Liens, Claims and Encumbrances and (II) Grant Administrative Expense Priority to Consignment Vendors for Consigned Goods Delivered Postpetition; and (B) Grant Replacement Liens to Consignment Vendors with Perfected Security Interests in Consigned Goods and/or Remit the Consignment Sale Price arising from Sale of Consigned Goods to Putative Consignment Vendors [D.I. 9];*
- B. *Debtors' Emergency Motion for Interim and Final Orders (A) Authorizing the Debtors to Assume the Closing Store Agreement, (B) Authorizing and Approving Store Closing Sales Free and Clear of all Liens, Claims and Encumbrances, (C)*

¹ The Debtors and the last four digits of each Debtor's federal tax identification numbers are as follows: Sports Authority Holdings, Inc. (9008); Slap Shot Holdings, Copr. (8209); The Sports Authority, Inc. (2802); TSA Stores, Inc. (1120); TSA Gift Card, Inc. (1918); TSA Ponce, Inc. (4817); and TSA Caribe, Inc. (5664). The headquarters for the above-captioned Debtors is located at 1050 West Hampden Avenue, Englewood, Colorado 80110.



Authorizing the Implementation of Customary Employee Bonus Program and Payments to Non-Insiders Thereunder, (D) Approving Dispute Resolution Procedures, and (E) Approving the Debtors' Store Closing Plan [D.I. 15]; and

- C. *Debtors' Motion for Interim and Final Orders (I) Authorizing Debtors to Obtain Post-Petition Secured Financing Pursuant to 11 U.S.C. §§ 105, 362, 363, and 364; (II) Granting Liens and Superpriority Claims to Post-Petition Lenders Pursuant to 11 U.S.C. §§ 364 and 507; (III) Authorizing the Use of Cash Collateral and Providing Adequate Protection to Prepetition Secured Parties and Modifying the Automatic Stay Pursuant to 11 U.S.C. §§ 361, 362, 363, and 364; and (IV) Scheduling a Final Hearing Pursuant to Bankruptcy Rules 4001(B) and (C) And Local Rule 4001-2 [D.I. 20].*

WHEREFORE, Midland Radio Corporation respectfully requests that the Court grant it the relief as set forth in the Omnibus Objection of ASICS America Corporation and grant such other and further relief as the Court deems just and proper.

Dated: April 5, 2016
Wilmington, Delaware

**GELLERT SCALI BUSENKELL
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Attorneys for Midland Radio Corporation

CERTIFICATE OF SERVICE

I, Margaret F. England, hereby certify that on this 5th day of April, 2016, and in addition to the service provided under the Court's CM/ECF system, I caused copies of the *Joinder of Midland Radio Corporation to the Omnibus Objection of ASICS America Corporation to Debtors' Motion for Orders of the (1) Consignment Motion; (2) GOB Motion; and (3) DIP Motion* to be served on the parties listed on the attached service list by first class mail and electronic mail.

Dated: April 5, 2016

/s/ Margaret F. England
Margaret England (No. 4248)

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