

Martin A. Sosland (18855645)
WEIL, GOTSHAL & MANGES LLP
200 Crescent Court, Suite 300
Dallas, Texas 75201
Telephone: (214) 746-7700
Facsimile: (214) 746-7777

Ronit J. Berkovich (*pro hac vice*)
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Debtor and
Debtor in Possession

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

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	:	
In re	:	Chapter 11
	:	
TEXAS RANGERS BASEBALL PARTNERS,	:	Case No. 10-43400 (DML)-11
	:	
Debtor.	:	
	:	
-----X		

MOTION FOR EMERGENCY HEARING ON DEBTOR'S MOTION PURSUANT TO SECTIONS 105(a) AND 363 OF THE BANKRUPTCY CODE FOR (i) APPROVAL OF PROCEDURES FOR THE SALE OF THE TEXAS RANGERS BASEBALL PARTNERS' ASSETS TO RANGERS BASEBALL EXPRESS LLC OR OTHER SUCCESSFUL BIDDER, (ii) AUTHORIZATION TO USE THE ASSET PURCHASE AGREEMENT AS A STALKING HORSE AGREEMENT WITH RANGERS BASEBALL EXPRESS LLC IN CONNECTION THEREWITH, (iii) APPROVAL OF THE PAYMENT OF BREAK-UP FEE AND (iv) THE SETTING OF RELATED AUCTION AND HEARING DATES

1. Texas Rangers Baseball Partners ("TRBP" or the "Debtor"), hereby requests that a hearing be set on the Debtor's Motion Pursuant to sections 105(a) and 363 of the Bankruptcy Code for (i) Approval of Procedures for the Sale of the Texas Rangers Baseball Partners' Assets to Rangers Baseball Express LLC or Other Successful Bidder, (ii) Authorization to Use the Asset Purchase Agreement as a Stalking Horse Agreement with Rangers Baseball

Express LLC in Connection Therewith, (iii) Approval of the Payment of a Break-Up Fee and (iv) the Setting of Related Auction and Hearing Dates (the "Motion") not later than July 9, 2010. A hearing by such date is necessary because the Debtor seeks to proceed with an auction by July 16, which will ensure the most efficient administration of its chapter 11 case for the benefit of all parties in interest.

2. Notice of the proposed emergency hearing will be provided to (i) the Office of the United States Trustee for the Northern District of Texas (the "U.S. Trustee"); (ii) counsel to the official committee of unsecured creditors (the "Creditors' Committee"); (iii) counsel to Major League Baseball, (iv) counsel to JPMorgan Chase Bank, N.A., as administrative agent under the First Lien Credit Facility, (v) counsel to GSP Finance LLC, as successor in interest to Barclays Bank PLC, as administrative agent under the Second Lien Credit Facility, and (vi) those parties that have requested notice pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") by the Debtor. This notice will be sufficient because (i) it notices all parties that are required to receive notice pursuant to Bankruptcy Rule 2002 and (ii) the Debtor conferred with the Chief Restructuring Officer for Rangers Equity GP and Rangers Equity LP and he supports this request for an emergency hearing.

Dated: July 5, 2010
Fort Worth, Texas

/s/ Martin A. Sosland
Martin A. Sosland (18855645)
WEIL, GOTSHAL & MANGES LLP
200 Crescent Court, Suite 300
Dallas, Texas 75201
Telephone: (214) 746-7700
Facsimile: (214) 746-7777

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CERTIFICATE OF CONFERENCE

The Debtor has conferred with the Chief Restructuring Officer for Rangers Equity GP and Rangers Equity LP regarding the Motion and has reached an agreement as to the expedited relief requested.

/s/ Martin A. Sosland
Martin A. Sosland