

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

SPORTS AUTHORITY HOLDINGS, INC., et  
al.

Debtors.

Chapter 11

Case No. 16-10527 (MFW)

(Jointly Administered)

Re: D.I. 9, 102, 103, 278, 667, 674, 931,  
932, 959, 1091, 1092, 1094, 1095, 1132,  
1139 & 1277

**JOINDER OF MIDLAND RADIO CORPORATION TO  
AGRON, INC.'S OBJECTION TO TERM LOAN AGENT'S  
EMERGENCY MOTION FOR ADEQUATE PROTECTION**

Midland Radio Corporation ("Midland") hereby joins in and adopts as its own (the "Joinder") the legal and factual arguments made in *Agron, Inc.'s Objection to Term Loan Agent's Emergency Motion for Adequate Protection* (the "Objection"). In support of this Joinder, Midland respectfully states as follows:

1. Before the Petition Date, Midland delivered from time to time certain goods on consignment ("Midland Consigned Goods") to TSA pursuant to a Pay by Scan Vendor Management Program instituted by TSA.

2. At all times during their consignment relationship, the parties acknowledged and agreed that all right, title, and interest in and to any of the Midland Consigned Goods remained with Midland and never transferred to TSA.

3. On April 6, 2016, the Court issued its Supplemental Interim Order Authorizing the Debtors to Continue to Sell Certain Prepetition Consigned Goods (Dkt. 1044), and a further hearing was scheduled for April 26, 2016. At present, the Debtors are authorized to sell consigned goods consistent with the terms of any valid consignment agreement existing as of the



Petition Date. Midland submits that the Debtors, and therefore the Term Loan Lenders, have no interest in the Midland Consigned Goods because such goods are not property of the bankruptcy estates, and the Term Lender should not be granted any relief inconsistent with that position until it is fully adjudicated in the Adversary Proceedings pending against Midland and the other consignment vendors.

4. On April 21, 2016, Agron filed its Objection to the Motion. To the extent the facts and legal arguments also pertain to Midland, Midland joins in and adopts the Agron Objection as if fully set forth herein.

5. Midland reserves the right to assert other and further objections at the hearing.

WHEREFORE, Midland Radio Corporation respectfully requests that the Court (i) deny the relief requested in the Motion for the reasons set forth in the Agron Objection, (ii) reserve all rights of Midland to assert further and other objections to the Motion, and (iii) grant such other and further relief as the Court deems just and proper. .

Dated: April 21, 2016  
Wilmington, Delaware

**GELLERT SCALI BUSENKELL  
& BROWN, LLC**

By: /s/ Margaret F. England  
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*Attorneys for Midland Radio Corporation*

**CERTIFICATE OF SERVICE**

I, Margaret England, Esquire, hereby certify that on April 21, 2016, I caused a true and correct copy of the *Joinder of Midland Radio Corporation to Agron, Inc.'s Objection to Term Loan Agent's Emergency Motion for Adequate Protection* to be served via the CM/ECF electronic notification and served via hand delivery and first class mail to the parties on the attached service list.

Date: April 21, 2016

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

<p><b><u>VIA HAND DELIVERY</u></b>  Michael R. Nestor, Esq.  Kenneth J. Enos, Esq.  Andrew L. Magaziner, Esq.  Young Conaway Stargatt &amp; Taylor, LLP  Rodney Square  1000 North King Street  Wilmington, DE 19801</p>	<p><b><u>VIA FIRST CLASS MAIL</u></b>  Robert A. Klyman, Esq.  Matthew J. Williams, Esq.  Jeremy L. Graves, Esq.  Sabina Jacobs, Esq.  Gibson, Dunn &amp; Crutcher LLP  333 South Grand Avenue  Los Angeles, CA 90071-1512</p>
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