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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 SECOND 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 BREAKUP 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 Second 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") as early as possible. A hearing as early as possible is necessary because the Debtor seeks to proceed with an auction by July 22, 2010 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 it notices all parties that are required to receive notice pursuant to Bankruptcy Rule 2002.

Dated: July 13, 2010
Fort Worth, Texas

/s/ Martin A. Sosland

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