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**ATTORNEYS FOR GSP FINANCE LLC, AS
SECOND LIEN AGENT**

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

In re:

**TEXAS RANGERS BASEBALL
PARTNERS**

Debtor.

§
§
§
§
§
§

**Case No. 10-43400 (DML)-11
(Chapter 11)**

**REQUEST FOR EMERGENCY HEARING ON EMERGENCY JOINT
MOTION OF LENDER PARTIES FOR RECONSIDERATION OF
COURT'S ORDER ADOPTING BIDDING PROCEDURES**

The Ad Hoc Group of First Lien Lenders,¹ including Monarch Alternative Capital LP, GSP Finance LLC, Kingsland Capital Management, Sankaty Advisors, LLC, and Stonehill Capital Management LLC; JP Morgan Chase Bank, N.A. as the First Lien Agent; and GSP Finance LLC, as the Second Lien Agent (collectively, the “Lender Parties”) hereby request that an emergency hearing be set on the *Emergency Joint Motion of Lender Parties for Reconsideration of Court’s Order Adopting Bidding Procedures* (the “Motion”)² as soon as the Court’s docket will allow.³

In the Motion, the Lender Parties seek to have this Court reconsider the Bidding Procedures Order entered on July 15, 2010 [Docket No. 363], which sets certain deadlines relating to confirmation of the Plan and adopts certain Bidding Procedures relating to the sale of the Texas Rangers. For the reasons set forth in the Motion, the Lender Parties request that this Court reconsider the Bidding Procedures Order and the Bidding Procedures approved therein. The Lender Parties assert that the Bidding Procedures will result in a fundamentally flawed auction that will not cure the defects in the presently unconfirmable Plan. Due to the time sensitive nature of this case and the rapidly approaching proposed bid and auction deadlines, the Lender Parties believe that expedited treatment of the Motion is necessary in order to put in place a process that will result in a competitive auction that maximizes value for the benefit of all stakeholders.

¹ Each in their capacity as lenders or managers of entities serving as lenders under the First Lien Credit Agreement.

² Capitalized terms used herein but not otherwise defined shall have the meanings assigned to them in the Motion.

³ The Lender Parties further request that the Court set the hearing such that the parties will have at least 24-hours advance notice to prepare for the hearing, given that the relief requested in the Motion contemplates an evidentiary hearing. Such notice will also allow parties to make necessary travel plans in advance of the hearing.

For the foregoing reasons, the Lender Parties request that this Court set a hearing on the Motion as soon as possible (while providing the parties at least 24-hours notice in advance of the hearing date).⁴ The Lender Parties further request such other relief, both at law and equity, to which they may be justly entitled.

⁴ The Court has currently scheduled a Status Conference for July 22, 2010.

Dated: July 15, 2010

Respectfully submitted,

By: /s/ Daniel C. Stewart

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