

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

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

In re :
 : Chapter 11
 RANGERS EQUITY HOLDINGS, L.P., :
 : Case No. 10-43624-DML-11
 :
 Debtor. :
 -----X

In re :
 : Chapter 11
 RANGERS EQUITY HOLDINGS, G.P., LLC, :
 : Case No. 10-43625-DML-11
 :
 Debtor. :
 -----X

**MOTION TO EXPEDITE HEARING REGARDING MOTION OF RANGERS EQUITY
HOLDINGS, L.P. AND RANGERS EQUITY HOLDINGS GP, LLC PURSUANT TO 11
U.S.C. § 363(B) OF THE BANKRUPTCY CODE FOR AUTHORITY
TO FILE MOTION FOR SUBSTANTIVE CONSOLIDATION**

Rangers Equity Holdings, L.P. (“**Rangers Equity LP**”) and Rangers Equity Holdings GP LLC (“**Rangers Equity GP**,” together with Rangers Equity LP, “**Rangers Equity Owners**”), by and through William Snyder, their Chief Restructuring Officer (the “**CRO**”), hereby request that an expedited hearing be set on their *Motion Pursuant to 11 U.S.C. § 363(b) of the Bankruptcy Code for Authority to File Motion for Substantive Consolidation* (the “**Motion**”) on or before August 4, 2010. In the Motion, Rangers Equity Owners seek authority to file a motion for

substantive consolidation of the Rangers Equity Owners bankruptcy estates with the bankruptcy estate of the Texas Rangers Baseball Partners (the “**Debtor**”).

For the reasons set forth in the Motion, Rangers Equity Owners request that this Court grant Mr. Snyder the authority to exercise his valid business judgment to move to substantive consolidate these bankruptcy estates. Rangers Equity Owners assert that substantively consolidating the Debtor’s and the Rangers Equity Owners’ estates will result in a significant benefit to the Rangers Equity Owners’ estates and their creditors, as the significant number of fraudulent midnight transfers that occurred on the eve of bankruptcy at the Debtor level will be preserved for prosecution for the benefit of the creditors at the Rangers Equity Owners’ estates level, which would otherwise evaporate if the Court confirms the current plan of reorganization proposed by the Debtor. Absent substantive consolidation, the value of these transfers may be lost forever. Due to the time sensitive nature of this case, Rangers Equity Owners believe that expedited treatment of the Motion is necessary.

For the foregoing reasons, Rangers Equity Owners request that this Court set a hearing on the Motion on or before August 4, 2010. Rangers Equity Owners further request such other relief, both at law and equity, to which they may be justly entitled.

Dated: July 19, 2010

Respectfully submitted,

FULBRIGHT & JAWORSKI L.L.P.

By: /s/ Louis R. Strubeck, Jr.

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PROPOSED COUNSEL FOR
RANGERS EQUITY HOLDINGS, L.P. AND
RANGERS EQUITY HOLDINGS GP, LLC

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Motion was served upon the counsel and parties of record, electronically through the Bankruptcy Court's Electronic Case Filing System on those parties that have consented to such service, on the 19th day of July, 2010.

/s/ Louis R. Strubeck, Jr.

Louis R. Strubeck, Jr.

CERTIFICATE OF CONFERENCE

I hereby certify that, on July 19, 2010, I attempted to contact counsel for the Debtor, the Lenders, and the Official Committee of Unsecured Creditors in the Texas Rangers Baseball Partners case by email correspondence and/or by phone. As of the time of the filing, we believe that the Lenders do not oppose the instant Motion. The Debtor and the Committee, however, oppose, or have yet to consent to, the requested relief.

/s/ Louis R. Strubeck, Jr.

Louis R. Strubeck, Jr.