



ENTERED

TAWANA C. MARSHALL, CLERK
THE DATE OF ENTRY IS
ON THE COURT'S DOCKET

The following constitutes the ruling of the court and has the force and effect therein described.


United States Bankruptcy Judge

Signed October 28, 2010

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

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

**ORDER GRANTING POST-EFFECTIVE DATE DEBTOR'S AND
PLAN ADMINISTRATOR'S MOTION TO ESTABLISH GENERAL
ADMINISTRATIVE EXPENSE CLAIM BAR DATE**

CAME ON for consideration the *Post-Effective Date Debtor's and Plan Administrator's Motion to Establish General Administrative Expense Claim Bar Date* (the "Motion"),¹ filed by Texas Rangers Baseball Partners, as the Post-Effective Date Debtor, and Alan M. Jacobs, in his capacity as the Post-Effective Date Debtor's Plan Administrator and Disbursing Agent under the confirmed Plan in the case. Having considered the Motion and the representations and arguments of counsel at the hearing on the Motion conducted on October 25, 2010, the Court finds as follows: (i) the Court has jurisdiction to hear and determine the Motion pursuant to 28

¹ Unless otherwise defined herein, all capitalized terms have the meanings ascribed to them in the Motion.

U.S.C. §§ 157(a) and 1334 and Article XII of the Plan; (ii) the Motion constitutes a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; (iv) notice of the Motion and the hearing thereon was appropriate under the circumstances and no further notice need be given; and (v) cause exists for the establishment of a General Administrative Expense Claim Bar Date in the case; the proposed date of the General Administrative Expense Claim Bar Date, General Administrative Expense Claim Procedures, and form and manner of notice to be provided of same are reasonable and appropriate under the circumstances; and the approval of same is in the best interest of creditors, administration of the Plan, and the Post-Effective Date Debtor. It is therefore:

ORDERED that the Motion is hereby GRANTED; it is further

ORDERED that the General Administrative Expense Claim Bar Date is hereby established as **November 24, 2010**; it is further

ORDERED that the following General Administrative Expense Claim Procedures are hereby approved with respect to the submission of applications for the allowance of General Administrative Expense Claims:

(a) Any party seeking the allowance of an unpaid General Administrative Expense Claim for which the holder thereof seeks payment under the Plan from the Post-Effective Date Debtor shall, by no later than the General Administrative Expense Claim Bar Date, (i) file an application under 11 U.S.C. § 503 for allowance of such General Administrative Expense Claim (an “Administrative Expense Claim Application”) with the Court, at U.S. Bankruptcy Court, Bankruptcy Clerk’s Office, 501 W. Tenth Street, Fort Worth, Texas 76102, or through the Court’s ECF system, and (ii) serve a true, correct, and complete copy of the Administrative Expense Claim Application on the following parties:

- Texas Rangers Baseball Partners, Attn: Alan M. Jacobs, Plan Administrator, c/o AMJ Advisors LLC, 999 Central Avenue, Suite 208, Woodmere, NY 11598;
- Counsel for the Post-Effective Date Debtor and Plan Administrator, Munsch Hardt Kopf & Harr, P.C., Attn: Joseph J. Wielebinski, 500 N. Akard Street, Suite 3800, Dallas, TX 75201-6658;

- Counsel for Baseball Express LLC, Foley & Lardner, LLP, Attn: Mary Kay Braza, 777 East Wisconsin Avenue, Milwaukee, WI 53202-5306;
- Counsel for Agent for First Lien Lenders, Latham & Watkins LLP, Attn: Mitchell Seider, 885 Third Avenue, New York, NY 10022;
- Counsel for Agent for Second Lien Lenders, Clifford Chance US LLP, Attn: Jason P. Young, 31 West 52nd Street, New York, NY 10019;
- Counsel for Ad Hoc Group of First Lien Lenders, Vinson & Elkins LLP, Attn: Daniel C. Stewart, 2001 Ross Avenue, Suite 3700, Dallas, TX 75201;
- Counsel for Rangers Equity Holdings, L.P. and Rangers Equity Holdings GP, LLC, Fulbright & Jaworski LLP, Attn: Louis R. Strubeck, 2200 Ross Avenue, Suite 2800, Dallas, TX 75201; and
- The Office of the United States Trustee, Attn: Lisa L. Lambert, 1100 Commerce Street, Room 976, Dallas, TX 75242.

(b) The Administrative Expense Claim Application must (i) specify the amount of the General Administrative Expense Claim sought for allowance, (ii) specify the date(s) on which the Claim was incurred, and (iii) include such other information and documentation as necessary to substantiate the bases for and validity of the Claim;

(c) Any unpaid General Administrative Expense Claim that is not evidenced in the Bankruptcy Case by the filing of an Administrative Expense Claim Application by the General Administrative Expense Claim Bar Date shall be forever barred and discharged in relation to the Post-Effective Date Debtor, and no distributions shall be made by the Post-Effective Date Debtor (or the Disbursing Agent on behalf of the Post-Effective Date Debtor) in relation thereto; and

(d) With respect to each Administrative Expense Claim Application that is timely filed and served, and which otherwise complies with the foregoing procedures, the deadline for the Post-Effective Date Debtor/Plan Administrator and all other parties in interest to object to the Application shall be twenty-four (24) days after the date on which the Administrative Expense Claim Application is filed with the Court.

It is further

ORDERED that the form of Proposed Notice for use in providing notice of the General Administrative Expense Claim Bar Date and General Administrative Expense Claim Procedures to creditors and other parties in interest is approved, and the Plan Administrator shall serve a

completed copy of the Proposed Notice on all creditors (including, without limitation, post-petition vendors) of the Debtor and all other parties in interest identified on the Official Services List in the case by no later than three (3) business days after the entry of this Order; it is further

ORDERED that nothing in the Motion or this Order shall be construed to limit, or in any way affect, the ability of the Post-Effective Date Debtor, the Plan Administrator, or any other party in interest to object to the allowance of any General Administrative Expense Claim on any ground, or to assert any defenses or offsets against such Claim, as to liability, amount, or otherwise; and it is further

ORDERED that the Court shall retain jurisdiction with respect to the implementation of this Order and all matters arising therefrom.

END OF ORDER

Submitted by:

Joseph J. Wielebinski
Texas Bar No. 21432400
Lee J. Pannier
Texas Bar No. 24066705
MUNSCH HARDT KOPF & HARR, P.C.
500 N. Akard Street, Suite 3800
Dallas, Texas 75201-6659
Telephone: (214) 855-7500
Facsimile: (214) 855-7584
jwielebinski@munsch.com
lpannier@munsch.com

*Attorneys for Post-Effective Date Debtor and
Plan Administrator/Disbursing Agent*