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**ATTORNEYS FOR RANGERS
BASEBALL EXPRESS, LLC**

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

_____)	
In re)	Chapter 11 Case
)	
TEXAS RANGERS BASEBALL)	Case No. 10-43400 (DML)
PARTNERS,)	
)	
Debtor.)	
_____)	
RANGERS BASEBALL EXPRESS LLC)	Adversary Case No. 10-04121 (DML)
)	
Plaintiff,)	
)	
-against-)	<u>Motion for Expedited Hearing</u>
)	
TEXAS RANGERS BASEBALL)	
PARTNERS,)	
)	
Defendant.)	
_____)	

**MOTION FOR EXPEDITED HEARING ON
PLAINTIFF'S EMERGENCY MOTION FOR PRELIMINARY
INJUNCTION AND A TEMPORARY RESTRAINING ORDER**

1. In this adversary proceeding, Plaintiff, Rangers Baseball Express LLC ("RBE" or "Plaintiff"), filed its Emergency Motion for a Preliminary Injunction and a Temporary Restraining Order (i) Prohibiting Debtor from Continuing to Breach the Asset Purchase Agreement and (ii) Directing Debtor to Comply with Its Obligations under the Asset Purchase Agreement (the "Emergency Motion").

2. Plaintiff hereby requests the Court to (i) schedule an expedited hearing on the requested Temporary Restraining Order within twenty-four (24) hours of the filing of this motion; (ii) require any objections to Plaintiff's requested Temporary Restraining Order be filed no later than an hour before the hearing, or at such time as the Court deems appropriate; (iii) schedule a hearing on the Preliminary Injunction at the same time as the confirmation hearing on the Debtors proposed chapter 11 plan; (iv) require any objections to the Plaintiff's requested Preliminary Injunction Order be filed no later than 4 p.m. (Central Time) on July 19, 2010.

3. As a result of recent events in the Debtor's chapter 11 proceedings, Plaintiff filed an adversary complaint seeking, inter alia, declaratory judgment and injunctive relief (the "Verified Complaint."). In order to preserve the status quo and protect Plaintiff's rights under the Asset Purchase Agreement between TRBP and RBE dated as of May 23, 2010 (the "APA"), Plaintiff filed the Emergency Motion. The interests of the parties and the Court in having this matter resolved expeditiously establish good cause for an expedited hearing.

4. As a consequence of discussions between the Debtor and RBE, the parties have reached an agreement on the terms of a TRO that would remain in place pending a hearing on RBE's request for a preliminary injunction. The parties believe that the Court's entry of the agreed TRO will obviate the need

for an emergency hearing and will permit the parties to focus their efforts on obtaining confirmation of the Debtor's plan within the framework discussed by the Court at the status conference held on Friday, July 9, 2010.

5. Notice of the proposed expediting hearing will be provided to counsel to Texas Rangers Baseball Partners (the "Debtor").

Dated: Fort Worth, Texas
July 12, 2010

By /s/ Craig Averch
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EXPRESS LLC**

CERTIFICATE OF CONFERENCE

On July 12, 2010, counsel for Plaintiff conferred with Martin Sosland, counsel for the Debtor. Counsel for the Debtors has agreed to the relief requested in this Emergency Motion.

By /s/ Craig Averch
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