

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

TRUMP ENTERTAINMENT RESORTS,  
INC., et al.<sup>1</sup>,

Debtors.

Case No. 14-12103 (KG)  
(Jointly Administered)

Chapter 11

**Re: Docket No. 482**

**NOTICE OF WITHDRAWAL OF MOTION ONLY**

**PLEASE TAKE NOTICE** that on November 14, 2014, the Official Committee of Unsecured Creditors (“Committee”) of Trump Entertainment Resorts, Inc. and its affiliated chapter 11 debtors and debtors-in-possession in the above-captioned bankruptcy proceeding, filed its *(I) Motion Pursuant to 11 U.S.C. § 1121(d) to Terminate Exclusivity to Permit The Official Committee of Unsecured Creditors to File and Solicit Acceptances of A Chapter 11 Plan of Liquidation; and (II) Supplemental Objection of the Official Committee of Unsecured Creditors to Debtors’ Motion for Order (A) Approving the Disclosure Statement; (B) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject the Plan; (C) Establishing Deadline and Procedures for Filing Objections; and (D) Granting Related Relief* (the “Motion and Supplemental Objection”) [Docket No. 482]. On March 12, 2015, the Court entered an Order confirming the *Debtors’ Third Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code as Modified* (the “Plan”) [Docket No. 1123].

In light of the confirmation of the Plan, the Committee hereby withdraws the portion of the Motion and Supplemental Objection relating to the Committee’s request to terminate the

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Trump Entertainment Resorts, Inc. (8402), Trump Entertainment Resorts Holdings, L.P. (8407), Trump Plaza Associates, LLC (1643), Trump Marina Associates, LLC (8426), Trump Taj Mahal Associates, LLC (6368), Trump Entertainment Resorts Development Company, LLC (2230), TER Development Co., LLC (0425) and TERH LP Inc. (1184).

Debtors' exclusivity without prejudice to the Committee's right to reinstate its request in the event the Effective Date of the Plan does not occur.

Dated: March 17, 2015  
Wilmington, Delaware

**GIBBONS P.C.**

/s/ Natasha M. Songonuga

Natasha M. Songonuga, Esq. (Bar No. 5391)  
1000 N. West Street, Suite 1200  
Wilmington, DE 19801-1058  
Telephone: (302) 295-4875  
Facsimile: (302) 295-4876  
E-mail: nsongonuga@gibbonslaw.com

-and-

Karen A. Giannelli, Esq. (admitted *pro hac vice*)  
Mark B. Conlan, Esq. (admitted *pro hac vice*)  
Guy V. Amoresano, Esq. (admitted *pro hac vice*)  
One Gateway Center  
Newark, New Jersey 07102-5310  
Telephone: (973) 596-4523  
Facsimile: (973) 639-6244  
E-mail: kgiannelli@gibbonslaw.com  
mconlan@gibbonslaw.com  
gamoresano@gibbonslaw.com

-and-

Nathan A. Schultz, Esq. (admitted *pro hac vice*)  
Law Office of Nathan A. Schultz, P.C.  
10621 Craig Road  
Traverse City, MI 49686  
Telephone: (310) 429-7128  
Facsimile: (231) 421-5731  
Email: nschultzesq@gmail.com

*Co-Counsel for the Official  
Committee of Unsecured Creditors*