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Attorneys for Debtor and
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

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

**REQUEST FOR EMERGENCY
CONSIDERATION OF CERTAIN "FIRST DAY" MATTERS**

Texas Rangers Baseball Partners ("TRBP" or the "Debtor") as debtor and debtor in possession in the above-referenced case filed a petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). Counsel for the Debtor believes that this case qualifies as a "Complex Chapter 11 Case."

The Debtor needs emergency consideration of the following initial case matters:

- Debtor's Motion Pursuant to Bankruptcy Rules 1007 and 2002(d) for an Order (I) Extending the Time to File Schedule of Assets and Liabilities, Schedule of Executory Contracts and Unexpired Leases, List of Equity Security Holders, Schedule of Current Income and Expenditures and Statement of Financial Affairs, and (II) Waiving the Requirements to File Same Upon Confirmation of the Plan [**Docket No. 15**]
- Debtors' Motion for Interim and Final Orders Authorizing (I) Postpetition Financing Pursuant to Sections 363 and 364 of the Bankruptcy Code, (II) the Granting of Liens, Security Interests and Superpriority Claims, (III) Debtor's Use of Cash Collateral Pursuant to Sections 105, 361, 362, 363 and 507 of the Bankruptcy Code and Providing Adequate Protection to Prepetition Lenders, (IV) Modifying the Automatic Stay, and (V) Scheduling a Final Hearing [**Docket No. 17**]
- Debtor's Motion for Interim and Final Orders Pursuant to Sections 363 and 105(a) of the Bankruptcy Code for Authority to Enter Into the Interim Support Agreement [**Docket No. 20**]
- Debtor's Motion Pursuant to Sections 105(a), 362(d), 363(b), 363(c) and 503(b) of the Bankruptcy Code for Authorization to (A) Continue Its Workers' Compensation, Liability, Property, and Other Insurance Programs and (B) Pay All Obligations in Respect Thereof [**Docket No. 16**]
- Debtor's Motion Pursuant to Sections 105(a), 363(b), and 541 of the Bankruptcy Code for Authorization to Pay Prepetition Sales and Use Taxes and Certain Other Governmental Assessments [**Docket No. 21**]
- Debtor's Motion Pursuant to Sections 105(a), 363(b), and 503(b)(1) of the Bankruptcy Code for Authorization to Honor Prepetition Obligations to Customers and Otherwise Continue Customer Programs in the Ordinary Course of Business [**Docket No. 22**]
- Debtor's Motion Pursuant to Sections 105(a), 363(c), and 345(b) of the Bankruptcy Code for (I) Authorization to (A) Continue Using the Existing Cash Management System (B) Maintain Existing Bank Accounts and Business Forms, and (II) an Extension of Time to Comply with the Requirements of Section 345(b) of the Bankruptcy Code [**Docket No. 23**]
- Debtor's Motion Pursuant to Sections 105(a), 363(b), and 507(a) of the Bankruptcy Code for Authorization (I) to Pay Certain Employee Compensation and Benefits and (II) to Maintain and Continue Such Benefits and Other Employee-Related Programs [**Docket No. 24**]

- Debtor's Motion Pursuant to Sections 105(a) and 363(b) of the Bankruptcy Code for Authorization to Pay the Prepetition Claims of Certain Creditors in the Ordinary Course of Business [**Docket No. 26**]
- Debtor's Motion for an Order (I) Scheduling a Hearing to Consider Confirmation of the Prepackaged Plan; (II) Establishing an Objection Deadline to Object to the Prepackaged Plan; (III) Approving the Form and Manner of Notice thereof; (IV) and Granting Related Relief [**Docket No. 28**]

WHEREFORE, the Debtor respectfully requests that this Court schedule an emergency hearing on all the aforementioned motions for **Tuesday, May 25, 2010 at 1:30 p.m. (Central Time)** in Fort Worth, Texas, and further request that this Court grant any other relief as it deems just and proper.

Dated: May 24, 2010
Fort Worth, Texas

/s/ Martin A. Sosland
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**ORDER GRANTING REQUEST FOR EMERGENCY
CONSIDERATION OF CERTAIN "FIRST DAY" MATTERS**
(Relates to Docket No. ____)

Upon the request, dated May 24, 2010, of Texas Rangers Baseball Partners in the above-referenced chapter 11 case, as debtor and debtor in possession

(“TRBP” or the “Debtor”), seeking emergency consideration of the following motions

(the “Emergency Motions”):

- Debtor’s Motion Pursuant to Bankruptcy Rules 1007 and 2002(d) for an Order (I) Extending the Time to File Schedule of Assets and Liabilities, Schedule of Executory Contracts and Unexpired Leases, List of Equity Security Holders, Schedule of Current Income and Expenditures and Statement of Financial Affairs, and (II) Waiving the Requirements to File Same Upon Confirmation of the Plan [**Docket No. 15**]
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This Court, having considered the relief sought in the request, the
Declaration of Kellie Fischer in Support of the Debtor's Chapter 11 Petition and First
Day Motions, and all matters of records hereby:

ORDERS, that all above-referenced Emergency Motions be set for hearing
on _____, 2010 at __:__ __ in the United States Bankruptcy Court,
Judge _____ presiding, in Fort Worth, Texas.

END OF ORDER