



**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 June 02, 2010

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.	:	
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**ORDER (I) SCHEDULING A HEARING TO CONSIDER  
ISSUES RELATING TO THE DISCLOSURE STATEMENT AND ISSUES  
RELATING TO PLAN CONFIRMATION; (II) ESTABLISHING DEADLINES WITH  
RESPECT THERETO; (III) APPROVING THE FORM AND MANNER OF NOTICE OF  
THE DEADLINES AND THE HEARING; AND (IV) GRANTING RELATED RELIEF**

Upon the motion (the "Motion"), dated May 24, 2010, of Texas Rangers Baseball Partners, as debtor and debtor in possession in the above-captioned chapter 11 case (the "Debtor"), pursuant to the Bankruptcy Code<sup>1</sup> and Bankruptcy Rules, for entry of an order (the "Scheduling Order") (i) scheduling a hearing to consider confirmation of the Prepackaged Plan;

(ii) establishing an objection deadline to object to the confirmation of the Prepackaged Plan; (iii) approving the form and manner of notice thereof; and (iv) granting related relief, all as more fully described in the Motion; and upon consideration of the Declaration of Kellie Fischer in Support of the Debtor's Chapter 11 Petition and Request for First Day Relief (the "Fischer Declaration"); and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334; and due and proper notice of the hearing to consider the relief requested therein (the "Hearing") having been provided to: (i) the Office of the U.S. Trustee for the Northern District of Texas (the "U.S. Trustee"); (ii) the Debtor's thirty largest unsecured creditors; (iii) counsel to the Purchaser; (iv) counsel to MLB; (v) counsel to the Major League Baseball Players Association; (vi) counsel to JPMorgan Chase Bank, N.A., as administrative agent under the First Lien Credit Agreement; and (vii) counsel to GSP Finance LLC, as successor in interest to Barclays Bank PLC, as administrative agent under the Second Lien Credit Agreement (collectively, the "Notice Parties"), and no further notice being necessary; and the legal and factual bases set forth in the Motion establishing just and sufficient cause to grant the relief granted herein; and the relief granted herein being in the best interests of the Debtor, its estate, creditors, and all parties in interest; and the Court having held the Hearing with the appearances of interested parties noted in the record of the Hearing; and upon the entire record and all of the proceedings before the Court, the Court hereby ORDERS that:

1. The Motion is granted to the extent set forth herein.

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<sup>1</sup> Capitalized terms used and not otherwise defined herein shall have the meanings ascribed to them in the Motion.

2. A hearing to consider the following issues related to the Disclosure Statement and issues related to plan confirmation and any briefs or other documents submitted in connection therewith (the "Briefs") is hereby scheduled to be held before the Honorable D. Michael Lynn, United States Bankruptcy Judge, in Room 128 of the United States Bankruptcy Court, Eldon B. Mahon U.S. Courthouse, 501 W. Tenth Street, Fort Worth, Texas 76102 (the "Bankruptcy Court") on June 15, 2010 at 9:30 a.m. (Central Time) or as soon thereafter as counsel may be heard (the "June 15 Hearing"): (i) whether the Disclosure Statement is adequate (including whether any disclosure is required by the Bankruptcy Code), (ii) whether under the Prepackaged Plan any class of creditors or equity holders is impaired and entitled to vote on the Prepackaged Plan, (iii) who may speak for Rangers Equity Holdings LP and Rangers Equity Holdings GP, LLC (the "Debtor's Equity Holders") in this chapter 11 case, (iv) what obligations are owed to whom by Debtor's Equity Holders respecting their conduct in this chapter 11 case, and (v) whether the Debtor is under an independent duty to maximize the value of the estate in connection with disposition of this chapter 11 case.

3. Any party wishing to be heard at the June 15 Hearing may, no later than June 11, 2010 at 4:30 p.m. (Central Time) (the "Briefing Deadline"), (i) manually file a Brief or objection to the adequacy of the Disclosure Statement with the Clerk of the Bankruptcy Court,<sup>2</sup> both in paper and in Portable Document Format ("PDF") format, (ii) hand deliver any Brief to the Chambers of the Honorable D. Michael Lynn, United States Bankruptcy Judge, in Room 128 of

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<sup>2</sup> Please note that the Bankruptcy Court's electronic filing system will be down from June 10, 2010 through and including June 14, 2010, requiring that all Briefs be filed manually with the Clerk of the Bankruptcy Court in lieu of electronic filing during this time.

the United States Bankruptcy Court, Eldon B. Mahon U.S. Courthouse, 501 W. Tenth Street, Fort Worth, Texas 76102, and (iii) serve the Brief and/or objection upon the following parties: (i) counsel to the Debtor, Weil, Gotshal & Manges LLP, 200 Crescent Court, Suite 300, Dallas, Texas 75201, Attn: Martin A. Sosland, Esq. (martin.sosland@weil.com) and Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, Attn: Ronit J. Berkovich, Esq. (ronit.berkovich@weil.com); (ii) counsel to the Purchaser, Foley & Lardner LLP, 777 East Wisconsin Avenue, Milwaukee, Wisconsin 53202, Attn: Mary K. Braza, Esq. (mbraza@foley.com) and Kevin R. Schulz, Esq. (kschulz@foley.com) and Foley & Lardner LLP, 321 North Clark Street, Suite 2800, Chicago, Illinois 60610, Attn: Michael J. Small, Esq. (msmall@foley.com); (iii) counsel to the Purchaser, Sherrard, German & Kelly, P.C., 28th Floor, Two PNC Plaza, 620 Liberty Avenue, Pittsburgh, Pennsylvania 15222, Attn: David J. Lowe, Esq. (djl@sgkpc.com); (iv) counsel to the Purchaser, Barlow Garsek & Simon, LLP, 3815 Lisbon Street, Fort Worth, Texas 76107, Attn: Robert A. Simon, Esq. (rsimon@bgsfirm.com); (v) counsel to the Committee, if one shall have been appointed; (vi) the U.S. Trustee, 1100 Commerce Street, Room 976, Dallas, Texas 75242, Attn: Lisa L. Lambert, Esq. (lisa.l.lambert@usdoj.gov) and Meredyth A. Kippes, Esq. (meredyth.a.kippes@usdoj.gov); (vii) counsel to JPMorgan Chase Bank, N.A., Latham & Watkins LLP, 885 Third Avenue, New York, New York 10022, Attn: Mitchell Seider, Esq. (mitchell.seider@lw.com) and Joseph Fabiani, Esq. (joseph.fabiani@lw.com); (viii) counsel to GSP Finance LLC, Clifford Chance US LLP, 31 West 52nd Street, New York, New York 10019, Attn: Jason P. Young, Esq. (Jason.Young@cliffordchance.com); (ix) counsel to MLB, Paul Weiss Rifkind Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019, Attn: Stephen J.

Shimshak, Esq. (sshimshak@paulweiss.com), Jordan E. Yarett, Esq. (jyarett@paulweiss.com) and Philip A. Weintraub, Esq. (pweintraub@paulweiss.com); (x) counsel to MLB, Stutzman, Bromberg, Esserman & Plifka, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201-2689, Attn: Sander L. Esserman, Esq. (esserman@sbep-law.com); (xi) counsel to MLB, Robert Kheel, Esq., 140 Riverside Drive, New York, New York 10024, Attn: Robert Kheel, Esq. (robertkheel@gmail.com); (xii) the Office of the Commissioner of Baseball, 245 Park Avenue, New York, New York 10167, Attn: Thomas J. Ostertag, Esq. (Tom.Ostertag@mlb.com); (xiii) counsel to the Ad Hoc Group of First Lien Lenders, Vinson & Elkins LLC, Trammell Crow Center, 2001 Ross Avenue, Suite 3700, Dallas, Texas 75201, Attn: Daniel C. Stewart, Esq. (dstewart@velaw.com); (xiv) counsel to the Ad Hoc Group of First Lien Lenders, Milbank, Tweed, Hadley & McCloy LLP, Suite 1100, International Square Building, 1850 K Street, N.W., Washington, DC 20006, Attn: Andrew M. LeBlanc, Esq. (aleblanc@milbank.com); (xv) counsel to JPMorgan Chase Bank, N.A., Rochelle McCullough, LLP, 325 N. St. Paul Street, Suite 4500, Dallas, Texas 75201, Attn: Buzz Rochelle, Esq. (buzz.rochelle@romclawyers.com) and Scott DeWolf, Esq. (sdewolf@romclawyers.com); and (xvi) counsel to GSP Finance LLC, Agent for the Second Lien Lenders, Gardere Wynne Sewell LLP, 1601 Elm Street, Suite 3000, Dallas, Texas 75501, Attn: Holland N. O'Neil, Esq. (honeil@gardere.com).

4. Briefs shall conform to the Bankruptcy Rules and Local Rules for the United States Bankruptcy Court for the Northern District of Texas, Fort Worth Division (the “Local Bankruptcy Rules”) and any Brief not timely filed and served in the manner set forth in this Order may, in the Court’s discretion, not be considered.

5. Service of the notice of commencement of this chapter 11 case (the

“Notice of Commencement”) and of the June 15 Hearing and the Briefing Deadline (the “June 15 Hearing Notice”), in the forms of notice attached as Exhibit 1 and Exhibit 2 to this Order, respectively, and in accordance with the provisions of this Order, and as applicable on shortened notice, shall be deemed good and sufficient notice of the commencement of the chapter 11 case, the June 15 Hearing, and the Briefing Deadline.

6. The Prepackaged Plan and Disclosure Statement shall be posted in PDF format on the website maintained by the Debtor’s proposed claims agent ([www.trbpinfo.com](http://www.trbpinfo.com)) and shall be provided in either electronic or paper form to any parties in interest upon written request to the Debtor’s counsel at: Weil, Gotshal & Manges LLP, 200 Crescent Court, Suite 300, Dallas, Texas 75201, Attn: Martin A. Sosland, Esq. and Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York, 10153, Attn: Ronit J. Berkovich, Esq.

7. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

8. The Debtor is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

9. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

10. Cause exists to shorten the notice period pursuant to Local Bankruptcy Rule 2002(b) and Bankruptcy Rules 2002(b) and 9006(c) with respect to the June 15 Hearing Notice.

###END OF ORDER###

**Exhibit 1**

**Notice of Commencement**

B9F Official Form 9F (Chapter 11 Reorganization/Partnership Case) (12/08)

Case Number 10-43400—dml11

UNITED STATES BANKRUPTCY COURT Northern District of Texas

**Notice of  
Chapter 11 Bankruptcy Case, Meeting of Creditors, & Deadlines**

A chapter 11 bankruptcy case concerning the debtor(s) listed below was filed on 5/24/10.

You may be a creditor of the debtor. **This notice lists important deadlines.** You may want to consult an attorney to protect your rights. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below.

NOTE: The staff of the bankruptcy clerk's office cannot give legal advice.

**See Reverse Side For Important Explanations**

Debtor(s) (name(s) used by the debtor(s) in the last 8 years, including married, maiden, trade, and address):

Texas Rangers Baseball Partners  
1000 Ballpark Way  
Suite 400  
Arlington, TX 76011

Case Number:  
10-43400—dml11

Social Security / Individual Taxpayer ID / Employer Tax ID / Other nos:  
75-2585320

Attorney for Debtor(s) (name and address):  
Martin A. Sosland  
Weil, Gotshal & Manges LLP  
200 Crescent Court, Suite 300  
Dallas, TX 75201-6950  
Telephone number: 214-746-7700

**Meeting of Creditors**

Date: **July 7, 2010**

Time: **10:00 AM**

Location: **Office of the U.S. Trustee, 1100 Commerce St., Room 752, Dallas, TX 75242**

**Deadline to File a Proof of Claim**

Proof of claim must be *received* by the bankruptcy clerk's office by the following deadline: August 23, 2010

For all creditors (except a governmental unit): TBD if needed

For a governmental unit: November 21, 2010

**Creditor with a Foreign Address:**

A creditor to whom this notice is sent at a foreign address should read the information under "Claims" on the reverse side.

**Deadline to File a Complaint to Determine Dischargeability of Certain Debts:**

**Creditors May Not Take Certain Actions:**

In most instances, the filing of the bankruptcy case automatically stays certain collection and other actions against the debtor and the debtor's property. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although the debtor can request the court to extend or impose a stay. If you attempt to collect a debt or take other action in violation of the Bankruptcy Code, you may be penalized. Consult a lawyer to determine your rights in this case.

**Address of the Bankruptcy Clerk's Office:**  
501 W. Tenth Street  
Fort Worth, TX 76102  
Telephone number: 817-333-6000

**For the Court:**  
Clerk of the Bankruptcy Court:  
Tawana C. Marshall

Hours Open: Monday — Friday 8:30 AM — 4:30 PM

Date: 5/28/10



**EXPLANATIONS**

**B9F Official Form 9F  
12/08**

<p>Filing of Chapter 11 Bankruptcy Case</p>	<p>A bankruptcy case under Chapter 11 of the Bankruptcy Code (title 11, United States Code) has been filed in this court by or against the debtor(s) listed on the front side, and an order for relief has been entered. Chapter 11 allows a debtor to reorganize or liquidate pursuant to a plan. A plan is not effective unless confirmed by the court. You may be sent a copy of the plan and a disclosure statement telling you about the plan, and you might have the opportunity to vote on the plan. You will be sent notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is serving, the debtor will remain in possession of the debtor's property and may continue to operate any business.</p>
<p><b>Legal Advice</b></p>	<p>The staff of the bankruptcy clerk's office cannot give legal advice. Consult a lawyer to determine your rights in this case.</p>
<p>Creditors Generally May Not Take Certain Actions</p>	<p>Prohibited collection actions are listed in Bankruptcy Code § 362. Common examples of prohibited actions include contacting the debtor by telephone, mail or otherwise to demand repayment; taking actions to collect money or obtain property from the debtor; repossessing the debtor's property; and starting or continuing lawsuits or foreclosures. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although the debtor can request the court to extend or impose a stay.</p>
<p>Meeting of Creditors</p>	<p>A meeting of creditors is scheduled for the date, time and location listed on the front side. <i>The debtor's representative must be present at the meeting to be questioned under oath by the trustee and by creditors.</i> Creditors are welcome to attend, but are not required to do so. The meeting may be continued and concluded at a later date without further notice. The court, after notice and a hearing, may order that the United States trustee not convene the meeting if the debtor has filed a plan for which the debtor solicited acceptances before filing the case.</p>
<p>Claims</p>	<p>A Proof of Claim is a signed statement describing a creditor's claim. If a Proof of Claim form is not included with this notice, you can obtain one at any bankruptcy clerk's office. You may look at the schedules that have been or will be filed at the bankruptcy clerk's office. If your claim is scheduled and is <i>not</i> listed as disputed, contingent, or unliquidated, it will be allowed in the amount scheduled unless you filed a Proof of Claim or you are sent further notice about the claim. Whether or not your claim is scheduled, you are permitted to file a Proof of Claim. If your claim is not listed at all <i>or</i> if your claim is listed as disputed, contingent, or unliquidated, then you must file a Proof of Claim or you might not be paid any money on your claim and may be unable to vote on the plan. A secured creditor retains rights in its collateral regardless of whether that creditor files a Proof of Claim. Filing a Proof of Claim submits the creditor to the jurisdiction of the bankruptcy court, with consequences a lawyer can explain. For example, a secured creditor who files a Proof of Claim may surrender important nonmonetary rights, including the right to a jury trial. <b>Filing Deadline for a Creditor with a Foreign Address:</b> The deadlines for filing claims set forth on the front of this notice apply to all creditors. If this notice has been mailed to a creditor at a foreign address, the creditor may file a motion requesting the court to extend the deadline.</p>
<p>Discharge of Debts</p>	<p>Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. See Bankruptcy Code § 1141(d). A discharge means that you may never try to collect the debt from the debtor, except as provided in the plan. If you believe that a debt owed to you is not dischargeable under Bankruptcy Code § 1141(d)(6)(A), you must start a lawsuit by filing a complaint in the bankruptcy clerk's office by the "Deadline to File a Complaint to Determine Dischargeability of Certain Debts" listed on the front side. The bankruptcy clerk's office must receive the complaint and any required filing fee by that Deadline.</p>
<p>Bankruptcy Clerk's Office</p>	<p>Any paper that you file in this bankruptcy case should be filed at the bankruptcy clerk's office at the address listed on the front side. You may inspect all papers filed, including the list of the debtor's property and debts and the list of the property claimed as exempt, at the bankruptcy clerk's office.</p>
<p>Creditor with a Foreign Address</p>	<p>Consult a lawyer familiar with United States bankruptcy law if you have any questions regarding your rights in this case.</p>
<p>Refer to Other Side for Important Deadlines and Notices</p>	

**Exhibit 2**

**June 15 Hearing Notice**

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.	:	
	:	
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**NOTICE OF HEARING TO CONSIDER ISSUES  
RELATING TO THE DISCLOSURE STATEMENT AND ISSUES  
RELATING TO THE CONFIRMATION OF A PLAN OF REORGANIZATION**

NOTICE IS HEREBY GIVEN as follows:

1. On May 24, 2010 (the “Commencement Date”), Texas Rangers Baseball Partners (“TRBP” or the “Debtor”), commenced a case (the “Chapter 11 Case”) under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Northern District of Texas, Fort Worth Division (the “Bankruptcy Court”).

2. On the Commencement Date, the Debtor filed a prepackaged plan of reorganization (the “Prepackaged Plan”) and disclosure statement relating thereto (the “Disclosure Statement”).<sup>3</sup> Copies of the Prepackaged Plan and Disclosure Statement, as well as any other document that has been filed in the Chapter 11 Case, (i) may be obtained upon request from the Debtor’s counsel at the addresses specified below, (ii) **are available on the website maintained by the Debtor’s proposed claims and noticing agent ([www.trbpinfo.com](http://www.trbpinfo.com))**, and (iii) are on file with the Clerk of the Bankruptcy Court, Eldon B. Mahon U.S. Courthouse, 501 W. Tenth Street, Fort Worth, Texas 76102, where they are available for review between the hours of 8:30 a.m. and 4:30 p.m. (Central Time).

3. **The debtor IS authorized to continue operating ITS business in chapter 11 in the ordinary course and to pay its employees and certain other creditors in full on an ongoing basis and without interruption.**

<sup>3</sup> The Bankruptcy Court has not approved the Debtor’s Prepackaged Plan or Disclosure Statement. If appropriate, the Bankruptcy Court will consider approval of the Prepackaged Plan at a subsequent hearing in which case a separate notice will be served. The Bankruptcy Court has tentatively scheduled a hearing for July 9, 2010 at 9:30 a.m. (Central Time) or as soon thereafter as counsel may be heard to consider confirmation of the Prepackaged Plan and any objections thereto.

### June 15 Hearing and Disclosure Statement Issues

4. A hearing to consider the following issues related to the Disclosure Statement and issues related to the confirmation of a plan of reorganization and any documents and briefs submitted in connection therewith (the “Briefs”) and to consider any other matter that may properly come before the Bankruptcy Court will be held before the Honorable D. Michael Lynn, United States Bankruptcy Judge, in Room 128 of the United States Bankruptcy Court, Eldon B. Mahon U.S. Courthouse, 501 W. Tenth Street, Fort Worth, Texas 76102, on **June 15, 2010 at 9:30 a.m. (Central Time)** or as soon thereafter as counsel may be heard (the “June 15 Hearing”): (i) whether the Disclosure Statement is adequate (including whether any disclosure is required by the Bankruptcy Code), (ii) whether under the Prepackaged Plan any class of creditors or equity holders is impaired and entitled to vote on the Prepackaged Plan, (iii) who may speak for Rangers Equity Holdings LP and Rangers Equity Holdings GP, LLC (the “Debtor’s Equity Holders”) in this chapter 11 case, (iv) what obligations are owed to whom by Debtor’s Equity Holders respecting their conduct in this chapter 11 case, and (v) whether the Debtor is under an independent duty to maximize the value of the estate in connection with disposition of this chapter 11 case. The Bankruptcy Court shall also consider the adequacy of the Disclosure Statement at the June 15 Hearing and will consider at that time any objections thereto. The June 15 Hearing may be adjourned from time to time without further notice. The June 15 Hearing may also be rescheduled by the Bankruptcy Court. Notice of the rescheduled time, if any, will be available on the electronic case filing docket.

5. Any party wishing to be heard at the June 15 Hearing may, **no later than June 11, 2010 at 4:30 p.m. (Central Time)** (the “Briefing Deadline”), (i) **manually file** any objection to the adequacy of the Disclosure Statement and/or a Brief addressing any issue described in the preceding paragraph with the Bankruptcy Clerk<sup>4</sup> both in paper and in Portable Document Format (PDF) format, (ii) **hand deliver** the Brief to the Chambers of the Honorable D. Michael Lynn, United States Bankruptcy Judge, in Room 128 of the United States Bankruptcy Court, Eldon B. Mahon U.S. Courthouse, 501 W. Tenth Street, Fort Worth, Texas 76102, and (iii) serve the objection and/or Brief upon the following parties:

- (i) counsel to the Debtor, Weil, Gotshal & Manges LLP, 200 Crescent Court, Suite 300, Dallas, Texas 75201, Attn: Martin A. Sosland, Esq. (martin.sosland@weil.com) and Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, Attn: Ronit J. Berkovich, Esq. (ronit.berkovich@weil.com);
- (ii) counsel to the Purchaser, Foley & Lardner LLP, 777 East Wisconsin Avenue, Milwaukee, Wisconsin 53202, Attn: Mary K. Braza, Esq. (mbraza@foley.com) and Kevin R. Schulz, Esq. (kschulz@foley.com) and Foley & Lardner LLP, 321 North Clark Street, Suite 2800, Chicago, Illinois 60610, Attn: Michael J. Small,

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<sup>4</sup> Please note that the Bankruptcy Court’s electronic filing system will be down from June 10, 2010 through and including June 14, 2010, requiring that all Briefs be filed manually with the Clerk of the Bankruptcy Court in lieu of electronic filing during this time.

- Esq. (msmall@foley.com);
- (iii) counsel to the Purchaser, Sherrard, German & Kelly, P.C., 28th Floor, Two PNC Plaza, 620 Liberty Avenue, Pittsburgh, Pennsylvania 15222, Attn: David J. Lowe, Esq. (djl@sgkpc.com);
  - (iv) counsel to the Purchaser, Barlow Garsek & Simon, LLP, 3815 Lisbon Street, Fort Worth, Texas 76107, Attn: Robert A. Simon, Esq. (rsimon@bgsfirm.com);
  - (v) counsel to the Committee, if one shall have been appointed;
  - (vi) the Office of the United States Trustee for the Northern District of Texas, 1100 Commerce Street, Room 976, Dallas, Texas 75242, Attn: Lisa L. Lambert, Esq. (lisa.l.lambert@usdoj.gov) and Meredyth A. Kippes, Esq. (meredyth.a.kippes@usdoj.gov);
  - (vii) counsel to JPMorgan Chase Bank, N.A., Latham & Watkins LLP, 885 Third Avenue, New York, New York 10022, Attn: Mitchell Seider, Esq. (mitchell.seider@lw.com) and Joseph Fabiani, Esq. (joseph.fabiani@lw.com);
  - (viii) counsel to GSP Finance LLC, Clifford Chance US LLP, 31 West 52nd Street, New York, New York 10019, Attn: Jason P. Young, Esq. (Jason.Young@cliffordchance.com);
  - (ix) counsel to MLB, Paul Weiss Rifkind Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019, Attn: Stephen J. Shimshak, Esq. (sshimshak@paulweiss.com), Jordan E. Yarett, Esq. (jyarett@paulweiss.com) and Philip A. Weintraub, Esq. (pweintraub@paulweiss.com);
  - (x) counsel to MLB, Stutzman, Bromberg, Esserman & Plifka, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201-2689, Attn: Sander L. Esserman, Esq. (esserman@sbep-law.com);
  - (xi) the Office of the Commissioner of Baseball, 245 Park Avenue, New York, New York 10167, Attn: Thomas J. Ostertag, Esq. (Tom.Ostertag@mlb.com);
  - (xii) counsel to the Ad Hoc Group of First Lien Lenders, Vinson & Elkins LLC, Trammell Crow Center, 2001 Ross Avenue, Suite 3700, Dallas, Texas 75201, Attn: Daniel C. Stewart, Esq. (dstewart@velaw.com);
  - (xiii) counsel to the Ad Hoc Group of First Lien Lenders, Milbank, Tweed, Hadley & McCloy LLP, Suite 1100, International Square Building, 1850 K Street, N.W., Washington, DC 20006, Attn: Andrew M. LeBlanc, Esq. (aleblanc@milbank.com);
  - (xiv) counsel to JPMorgan Chase Bank, N.A., Rochelle McCullough, LLP, 325 N. St.

Paul Street, Suite 4500, Dallas, Texas 75201, Attn: Buzz Rochelle, Esq.  
(buzz.rochelle@romclawyers.com) and Scott DeWolf, Esq.  
(sdewolf@romclawyers.com); and

- (xv) counsel to GSP Finance LLC, Agent for the Second Lien Lenders, Gardere Wynne Sewell LLP, 1601 Elm Street, Suite 3000, Dallas, Texas 75501, Attn: Holland N. O'Neil, Esq. (honeil@gardere.com).
- (xvi) counsel to MLB, Robert Kheel, Esq., 140 Riverside Drive, New York, New York 10024, Attn: Robert Kheel, Esq. (robertkheel@gmail.com);

**If you have questions about this Notice or the Prepackaged Plan, please contact the Debtor's claims and noticing agent at (888) 369-8930. UNLESS A BRIEF IS TIMELY SERVED AND FILED IN ACCORDANCE WITH THIS NOTICE, IT MAY NOT BE CONSIDERED BY THE BANKRUPTCY COURT.**

Dated: Fort Worth, Texas  
June 2, 2010

BY ORDER OF THE COURT

Martin A. Sosland (18855645)  
WEIL, GOTSHAL & MANGES LLP  
200 Crescent Court, Suite 300  
Dallas, Texas 75201  
Telephone: (214) 746-7700  
Facsimile: (214) 746-7777

Ronit J. Berkovich (*pro hac vice*)  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007

*Attorneys for Debtor and  
Debtor in Possession*