

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re

SPORTS AUTHORITY HOLDINGS, INC.,  
et al.,<sup>1</sup>

Debtors.

Chapter 11

Case No. 16-10527-MFW

(Jointly Administered)

**OBJECTION OF BRAVO SPORTS AND JOINDER TO OBJECTION  
OF ASICS AMERICA CORPORATION TO DEBTORS' MOTIONS  
FOR ORDERS ON THE (1) CONSIGNMENT MOTION; (2) GOB  
MOTION; AND (3) DIP MOTION**

Bravo Sports, a supplier of goods to the Debtors on a consignment basis, hereby objects to the following motions filed by the Debtors: (1) the Consignment Motion [Docket No. 9]; (2) the GOB Motion [Docket No. 15]; and (3) the DIP Motion [Docket No. 20], and joins in and incorporates the arguments stated in the *Omnibus Objections of ASICS America Corporation to Debtors' Motions for Orders on the (1) Consignment Motion; (2) Gob Motion; and (3) DIP Motion* (the "ASICS Objection") [Docket No. 644].

Bravo Sports adopts the arguments of ASICS set forth in the ASICS Objection as though fully set forth in this pleading, substituting Bravo Sports for ASICS wherever appropriate. Bravo Sports supplied goods to the Debtors pursuant to the same "Pay by Scan" program as ASICS and pursuant to the same, or substantially the same, terms and conditions as ASICS and the other consignment vendors. Bravo Sports

<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are as follows: Sports Authority Holdings, Inc. (9008); Slap Shot Holdings, Corp. (8209); The Sports Authority, Inc. (2802); TSA Stores, Inc. (1120); TSA Gift Card, Inc. (1918); TSA Ponce, Inc. (4817); and TSA Caribe, Inc. (5664). The headquarters for the above-captioned Debtors is located at 1050 West Hampden Avenue, Englewood, Colorado 80110.



shipped a variety of goods to the Debtors, including pop-up canopies, chairs, skateboards and other items.

WHEREFORE, Bravo Sports respectfully requests this Court (i) modify the Consignment Motion, the GOB Motion, and the DIP Motion as requested in the ASICS Objection, and (ii) grant such further relief as the Court deems appropriate under the circumstances.

Dated: March 22, 2016

Respectfully submitted,

/s/ Robert Karl Hill

Robert Karl Hill (DE#2747)  
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- and -

Matthew A. Lesnick (motion for admission  
*pro hac vice* pending)  
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*Counsel to Bravo Sports*

**CERTIFICATE OF SERVICE**

I, R. Karl Hill, Esquire, hereby certify that on March 22, 2016, I caused a true and correct copy of the *Objection and Joinder to ASICS Objection* to be served via the CM/ECF electronic notification and served via hand delivery and first class mail according to the parties listed below.

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| <p><b><u>VIA HAND DELIVERY</u></b><br/>                 Michael R. Nestor, Esq.<br/>                 Kenneth J. Enos, Esq.<br/>                 Andrew L. Magaziner, Esq.<br/>                 Young Conaway Stargatt &amp; Taylor, LLP<br/>                 Rodney Square<br/>                 1000 North King Street<br/>                 Wilmington, DE 19801</p> | <p><b><u>VIA FIRST CLASS MAIL</u></b><br/>                 Robert A. Klyman, Esq.<br/>                 Matthew J. Williams, Esq.<br/>                 Jeremy L. Graves, Esq.<br/>                 Sabina Jacobs, Esq.<br/>                 Gibson, Dunn &amp; Crutcher LLP<br/>                 333 South Grand Avenue<br/>                 Los Angeles, CA 90071-1512</p> |
| <p><b><u>VIA HAND DELIVERY</u></b><br/>                 Hannah Mufson McCollum<br/>                 Office of the United States Trustee<br/>                 U.S. Department of Justice<br/>                 844 King Street, Suite 2207<br/>                 Lockbox #35<br/>                 Wilmington, DE 19801</p>  | <p><b><u>VIA FIRST CLASS MAIL</u></b><br/>                 Jeffrey N. Pomerantz, Esq.<br/>                 Pachulski Stang Ziehl &amp; Jones LLP<br/>                 10100 Santa Monica Blvd., 13<sup>th</sup> Floor<br/>                 Los Angeles, CA 90067-4100</p>  |
| <p><b><u>VIA HAND DELIVERY</u></b><br/>                 Bradford J. Sandler, Esq.<br/>                 Pachulski Stang Ziehl &amp; Jones LLP<br/>                 919 N. Market Street, 17<sup>th</sup> Floor<br/>                 Wilmington, DE 19801</p>  | <p><b><u>VIA FIRST CLASS MAIL</u></b><br/>                 Robert J. Feinstein, Esq.<br/>                 Pachulski Stang Ziehl &amp; Jones LLP<br/>                 780 Third Avenue, 36<sup>th</sup> Floor<br/>                 New York, NY 10017-2024</p>  |

Date: March 22, 2016

/s/ R. Karl Hill  
 R. Karl Hill (DE# 2747)