

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

In re:

SPORTS AUTHORITY HOLDINGS, INC.,
et al.,¹

Debtors.

Chapter 11

Case No.: 16-10527 (MFW)

(Jointly Administered)

Re: Docket Nos. 9, 15, 20 and 644

Hearing Date: 3/29/2016 at 1:00 p.m. (EDT)

**JOINDER OF ALTUS BRANDS, LLC TO THE
OMNIBUS OBJECTION OF ASICS AMERICA CORPORATION
TO DEBTORS' MOTIONS FOR ENTRY OF FINAL ORDERS ON THE
(1) CONSIGNMENT MOTION; (2) GOB MOTION; AND (3) DIP MOTION**

Altus Brands, LLC (“Altus”), one of the Debtors’ consignors, hereby joins in and adopts as its own the legal and factual arguments (the “Joinder”) made in the omnibus objection (the “Objection”) of ASICS America Corporation to the following motions filed by Sports Authority Holdings, Inc. and its affiliated debtors and debtors in possession:

1. Debtors’ Motion for Interim and Final Orders (A) Authorizing the Debtors to (I) Continue to Sell Consigned Goods in the Ordinary Course of Business Free and Clear of all Liens, Claims and Encumbrances and (II) Grant Administrative Expense Priority to Consignment Vendors for Consigned Goods Delivered Postpetition; and (B) Grant Replacement Liens to Consignment Vendors with Perfected Security Interests in Consigned Goods and/or Remit the Consignment Sale Price arising from Sale of Consigned Goods to Putative Consignment Vendors [D.I. No. 9];
2. Debtors’ Emergency Motion for Interim and Final Orders (A) Authorizing the Debtors to Assume the Closing Store Agreement, (B) Authorizing and Approving Store Closing Sales Free and Clear of all Liens, Claims and Encumbrances, (C) Authorizing the Implementation of Customary Employee Bonus Program and Payments to Non-Insiders Thereunder, (D) Approving Dispute Resolution Procedures, and (E) Approving the Debtors’ Store Closing Plan [D.I. No. 15]; and
3. Debtors’ Motion for Interim and Final Orders (I) Authorizing Debtors to Obtain Post-Petition Secured Financing Pursuant to 11 U.S.C. §§ 105, 362, 363, and 364 (II) Granting

¹ 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.



Liens and Superpriority Claims to Post-Petition Lenders Pursuant to 11 U.S.C. §§ 364 and 507; (III) Authorizing the Use of Cash Collateral and Providing Adequate Protection to Prepetition Secured Parties and Modifying the Automatic Stay Pursuant to 11 U.S.C. §§ 361, 362, 363, and 364; and (IV) Scheduling a Final Hearing Pursuant to Bankruptcy Rules 4001(B) and (C) And Local Rule 4001-2 [D.I. No. 20].

WHEREFORE, Altus respectfully requests that the Court grant the relief as set forth in the Objection and grant such other and further relief as the Court deems just and proper.

**McELROY, DEUTSCH, MULVANEY
& CARPENTER, LLP**

Dated: March 22, 2016

/s/ David P. Primack
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CERTIFICATE OF SERVICE

I, David P. Primack, Esquire, am an attorney of the firm of McElroy, Deutsch, Mulvaney & Carpenter, LLP, attorneys for Altus Brands, LLC, in the within matter. On March 22, 2016 true and accurate copies of the *foregoing document* was served upon all parties in interest by means of the CM/ECF and additionally as indicated:

Michael R. Nestor, Esq. Kenneth J. Enos, Esq. Andrew L. Magaziner, Esq. Young Conaway Stargatt & Taylor, LLP Rodney Square 1000 North King Street Wilmington DE 19801 Via Hand Delivery	Hannah Mufson McCollum Office of the United States Trustee U.S. Department of Justice 844 King Street, Suite 2207 Wilmington DE 19801 Via Hand Delivery	Bradford J. Sandler, Esq.re Pachulski Stang Ziehl & Jones LLP 919 Market Street, 17 th Floor Wilmington, DE 19801 Via Hand Delivery
Robert J. Feinstein, Esq. Pachulski Stang Ziehl & Jones LLP 780 Third Avenue, 36 th New York, NY 10017-201 Via First Class Mail	Robert A. Kylman, Esq. Matthew J. Williams, Esq. Jeremey L. Graves, Esq. Sabina Jacobs, Esq. Gibson Dunn & Crutcher LLP 333 South Grand Avenue Los Angeles, CA 90071-1512 Via First Class Mail	

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**McELROY, DEUTSCH, MULVANEY
& CARPENTER, LLP**

Dated: March 22, 2016

/s/ David P. Primack _____

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