

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

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In re:	:	Chapter 11
	:	
SPORTS AUTHORITY HOLDINGS, INC., <i>et al.</i> , <sup>1</sup>	:	Case No. 16-10527-MFW
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		Re: D.I. 9, 15, 20 & 644

**JOINDER OF FILMAR USA, INC. TO OMNIBUS OBJECTION OF ASICS AMERICA CORPORATION TO DEBTORS’ MOTIONS FOR ORDERS ON THE (1) CONSIGNMENT MOTION; (2) GOB MOTION; AND (3) DIP MOTION**

Filmar USA, Inc. (“Filmar”) hereby concurs with and joins the omnibus objection filed by ASICS America Corporation [Docket No. 644] (the “ASICS Objection”) to: (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* [Docket 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)*

<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.



*Approving Dispute Resolution Procedures, and (E) Approving the Debtors' Store Closing Plan* [Docket 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 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* [Docket No. 20] (collectively, the "Motions"). Specifically, Filmar objects to any request by the above-captioned Debtors in the Motions to sell or grant a security interest in any goods owned by Filmar without Filmar's consent and without affording Filmar its full procedural rights under the Federal Rules of Bankruptcy Procedure and applicable law.

WHEREFORE, Filmar requests that the Motions be denied or, alternatively, that they be modified to protect Filmar's interests as described above and in the ASICS Objection.

Dated: March 22, 2016

Respectfully submitted,

/s/ Frederick B. Rosner

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Frederick B. Rosner (DE 3995)  
Julia B. Klein (DE 5198)  
THE ROSNER LAW GROUP LLC  
824 N. Market Street, Suite 810  
Wilmington, DE 19801  
Telephone: (302) 777-1111  
E-mail: rosner@teamrosner.com  
klein@teamrosner.com

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Jeremy R. Fischer  
DRUMMOND WOODSUM  
84 Marginal Way, Suite 600  
Portland, ME 04102  
Telephone: (207) 772-1941  
E-mail: jfischer@dwmlaw.com

*Counsel to Filmar USA, Inc.*