

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

| | | |
|---|---|-------------------------|
| In re: |) | |
| |) | Chapter 11 |
| |) | |
| SPORTS AUTHORITY HOLDINGS, INC., <i>et al.</i> , ¹ |) | Case No. 16-10527 (MFW) |
| |) | (Jointly Administered) |
| |) | |
| Debtors. |) | |
| |) | Re: Docket No. 714 |

MOTION TO SHORTEN NOTICE OF, AND SCHEDULE A HEARING ON, EMERGENCY MOTION OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS (I) TO CONTINUE HEARING DATE WITH RESPECT TO THE DEBTORS' DIP FINANCING MOTION AND BID PROCEDURES MOTION AND (II) FOR A PROTECTIVE ORDER AND ORDER QUASHING NOTICES OF DEPOSITION

The Official Committee of Unsecured Creditors (the “Committee”) of Sports Authority Holdings, Inc., *et al.* (the “Debtors”) in the above-captioned cases hereby files this motion (the “Motion to Shorten”) for entry of an order, substantially in the form attached hereto as Exhibit A (the “Order”), to shorten the notice period of, and schedule a telephonic hearing on, the *Emergency Motion of Official Committee of Unsecured Creditors (I) to Continue Hearing Date with Respect to the Debtors’ DIP Financing Motion and Bid Procedures Motion and (II) for a Protective Order and Order Quashing Notices of Deposition* (the “Motion”),² filed contemporaneously herewith, such that (i) the Motion may be heard at a telephonic hearing on March 23, 2016, or as soon as practicable in accordance with the Court’s calendar and (ii) objections to the Motion, if any, be filed prior thereto. In support of this Motion to Shorten, the Committee respectfully states as follows.

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.

² Capitalized terms not otherwise defined herein shall have the meaning given to them in the Motion.



Jurisdiction

1. This Court has jurisdiction over this Motion to Shorten pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157. Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory basis for the relief requested herein is Rule 9006(c)(1) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 9006-1(e) of the Local Rules of Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”).

Relief Requested

3. The Committee requests that the Court shorten the period for notice of the hearing on the Motion so that this Court may consider the Motion on an expedited basis on March 23, 2016, or as soon as practicable in accordance with the Court’s calendar.

Basis for Relief

4. Local Rule 9006-1(c)(i) provides that unless the Bankruptcy Rules or the Local Rules state otherwise, “all motion papers shall be filed and served in accordance with Local Rule 2002-1(b) at least eighteen (18) days (twenty-one (21) days if service is by first class mail; nineteen (19) days if service is by overnight delivery) prior to the hearing date.” Local Rule 9006-1(e) provides in pertinent part that “no motion will be scheduled on less notice than required by these Local Rules or the Fed. R. Bankr. P. except by order of the Court, on written motion . . . specifying the exigencies justifying shortened notice.”

5. In support of this Motion to Shorten, the Committee represents that a prompt hearing on the Motion is in the best interest of Debtors’ estates and that the exigencies justify shortened notice. For the reasons set forth in the Motion, the Committee is requesting (i) a continuance of the hearing to consider both the final approval of the DIP Motion and Bid

Procedures Motion from March 29, 2016 to approximately one week later and (ii) an order protecting the Committee and quashing the notices of deposition served on the Committee relating to the DIP Motion. The short continuance will enable the Committee and the Debtors to conduct an orderly discovery process and permit the Committee to adequately evaluate and prepare an objection to the DIP Motion and Bid Procedures Motion. Given the short timeframe between today and the presently scheduled hearing on these motions (March 29, 2016), the objection deadline for the DIP Motion (March 24, 2016), and the requested deposition date (March 28, 2016), a prompt hearing on the Motion is necessary.

6. The Committee also submits that hearing the Motion on shortened notice will not prejudice parties in interest. In order to allow parties additional time to respond, this Motion to Shorten and the Motion are being served via hand delivery, email, express mail or overnight delivery on: (i) counsel for the Debtors; (ii) counsel for the DIP Agent and DIP Lenders and the Prepetition Secured Parties; (iii) the U.S. Trustee; and (iv) parties who have requested notice pursuant to Bankruptcy Rule 2002 (collectively, the “Notice Parties”).

7. Accordingly, the Committee respectfully submits that exigent circumstances and sufficient cause exist to justify: (a) shortening the period for notice of the hearing on the Motion; (b) scheduling a telephonic hearing on the Motion on March 23, 2016, or as soon as practicable in accordance with the Court’s calendar; and (c) setting the objection deadline for the Motion.

Notice

8. The Committee has provided notice of this Motion to Shorten by e-mail, hand delivery, overnight mail, express mail, or facsimile to the Notice Parties identified above.

9. If the Court grants this Motion to Shorten, the Committee will immediately serve a copy of the Order and a notice for the hearing on the Motion on the above-noted Notice Parties by e-mail, hand delivery, overnight mail, express mail, or facsimile.

No Prior Request

10. No prior motion for the relief requested herein has been made to this or any other court.

WHEREFORE, the Committee respectfully requests the entry of an order: (a) shortening the period for notice of the hearing on the Motion; (b) scheduling a telephonic hearing on the Motion on March 23, 2016, or as soon as practicable in accordance with the Court's calendar; and (c) setting the objection deadline for the Motion.

Dated: March 22, 2016

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

Robert J. Feinstein (NY Bar No. 1767805)
Jeffrey N. Pomerantz (CA Bar No. 143717)
Bradford J. Sandler (DE Bar No. 4142)
Colin R. Robinson (DE Bar No. 5524)
919 North Market Street, 17th Floor
Wilmington, DE 19801
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: rfeinstein@pszjlaw.com
jpomerantz@pszjlaw.com
bsandler@pszjlaw.com
crobinson@pszjlaw.com

*[Proposed] Counsel to the Official Committee of
Unsecured Creditors*

EXHIBIT A

Proposed Order

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

| | | |
|---|---|-------------------------|
| |) | |
| In re: |) | Chapter 11 |
| |) | |
| SPORTS AUTHORITY HOLDINGS, INC., <i>et al.</i> , ¹ |) | Case No. 16-10527 (MFW) |
| |) | (Jointly Administered) |
| |) | |
| Debtors. |) | |
| |) | Re: Docket No. _____ |

ORDER SHORTENING PERIOD FOR NOTICE OF, AND SCHEDULING HEARING ON, EMERGENCY MOTION OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS (I) TO CONTINUE HEARING DATE WITH RESPECT TO THE DEBTORS’ DIP FINANCING MOTION AND BID PROCEDURES MOTION AND (II) FOR A PROTECTIVE ORDER AND ORDER QUASHING NOTICES OF DEPOSITION

Upon consideration of the motion (the “Motion to Shorten”)² of the Official Committee of Unsecured Creditors (the “Committee”) of Sports Authority Holdings, Inc., *et al.* (the “Debtors”) in the above-captioned cases for entry of an order (this “Order”) shortening the notice period of, and scheduling related matters on, the *Emergency Motion of Official Committee of Unsecured Creditors (I) to Continue Hearing Date with Respect to the Debtors’ DIP Financing Motion and Bid Procedures Motion and (II) for a Protective Order and Order Quashing Notices of Deposition* (the “Motion”); and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that venue of this proceeding and the Motion to Shorten in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion to Shorten is in the best

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² Capitalized terms not defined herein shall have the meaning ascribed to them in the Motion to Shorten.

interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having found that the Committee's notice of the Motion to Shorten and opportunity for a hearing on the Motion to Shorten were appropriate and no other notice need be provided; and this Court having reviewed the Motion to Shorten and having determined that the legal and factual bases set forth in the Motion to Shorten establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion to Shorten is GRANTED.
2. The telephonic hearing on the Motion is scheduled for _____, 2016, at ____:____ __.m. prevailing Eastern time.
3. Any objections or responses to the Motion must be in writing and filed on or before _____, 2016, at ____:____ __.m. prevailing Eastern time.
4. Immediately after the entry of this Order, the Committee shall serve a copy of this Order and a notice for the hearing on the Motion on the Notice Parties, who were originally served with the Motion to Shorten and the Motion, in the manner described in the Motion to Shorten.

Dated: _____, 2016

Honorable Mary F. Walrath
United States Bankruptcy Judge