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**ATTORNEYS FOR THE AD HOC  
GROUP OF FIRST LIEN LENDERS**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

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<b>In re:</b>	§	
	§	
<b>TEXAS RANGERS BASEBALL PARTNERS</b>	§	<b>Case No. 10-43400 (DML)-11 (Chapter 11)</b>
	§	
<b>Debtor.</b>	§	
	§	

**THE AD HOC GROUP OF FIRST LIEN LENDERS' OBJECTION TO  
APPLICATION TO EMPLOY K&L GATES LLP AS COUNSEL FOR  
THE UNSECURED CREDITORS COMMITTEE**

**TO THE HONORABLE D. MICHAEL LYNN, UNITED STATES BANKRUPTCY  
JUDGE:**

The Ad Hoc Group of First Lien Lenders (the "Ad Hoc Group"), which consists of GSP Finance LLC, Kingsland Capital Management, LLC, Monarch Alternative Capital, L.P., Sankaty

Advisors LLC, and Stonehill Capital Management LLC,<sup>1</sup> hereby files this *Objection to Application to Employ K&L Gates LLP as Counsel for the Unsecured Creditors Committee* (the “Objection”), and respectfully states as follows:

### **JURISDICTION AND VENUE**

1. This Court has jurisdiction over this matter under 28 U.S.C. §§ 157 and 1334.
2. This is a core proceeding under 28 U.S.C. § 157(b), and venue is proper under 28 U.S.C. §§ 1408 and 1409.

### **PROCEDURAL HISTORY**

3. On May 24, 2010 (the “Petition Date”), Texas Rangers Baseball Partners (“TRBP” or the “Debtor”) filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, which commenced the bankruptcy case styled *In re Texas Rangers Baseball Partners*; Case No. 10-43400-DML-11 (the “Bankruptcy Case”), which is pending before this Court. TRBP owns and operates the Texas Rangers Major League Baseball Club (the “Texas Rangers”).

4. Also on May 24, 2010, TRBP filed TRBP filed a *Prepackaged Plan of Reorganization for Texas Rangers Baseball Partners under Chapter 11 of the Bankruptcy Code* [Docket No. 31] (the “Plan”) and a related *Disclosure Statement* [Docket No. 34] (the “Disclosure Statement”).

5. On June 3, 2010, in accordance with Bankruptcy Code § 1102(a)(1), the United States Trustee appointed the members of the Official Committee of Unsecured Creditors in the Bankruptcy Case (the “Committee”) and filed a notice of such appointment with the Court [Docket No. 128].

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<sup>1</sup> Each in their capacity as lenders or manager of entities serving as lenders under that certain Amended and Restated First Lien Credit and Guaranty Agreement dated December 19, 2006 (as amended, supplemented or otherwise modified and in effect from time to time), among others, Hicks Sports Group LLC and the Lenders party thereto.

6. On June 10, 2010, the Committee filed its *Application to Employ K&L Gates LLP as Counsel for the Unsecured Creditors Committee* [Docket No. 154] (the “Application”).

### **RELIEF REQUESTED**

7. The Ad Hoc Group requests that this Court deny the Application and the relief requested therein because, pursuant to the Plan, the general unsecured creditors are unimpaired. The Committee seeks to employ K&L Gates in order to, *inter alia*, “[t]ake all necessary action to protect and to serve the interests of the unsecured creditors of the Debtor . . .” *Application*, ¶ 7(i), p. 3.

8. The Plan proposes that all unsecured creditors will be paid in full. As a result, the interests of the unsecured creditors of the Debtor are already “adequately protected and served” in this Bankruptcy Case. It would be imprudent to approve the Application and the relief requested therein when granting such relief would merely add to the mounting administrative expenses of the Debtor’s estate without serving a necessary administrative function for the estates.

### **PRAYER**

WHEREFORE, the Ad Hoc Group respectfully requests that this Court deny the relief requested in the Application. The Ad Hoc Group further requests that it be granted all other relief to which it may be justly entitled.

Dated: June 17, 2010

Respectfully submitted,

By:  /s/ Daniel C. Stewart

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 17, 2010, true and correct copies of the foregoing were served on the parties receiving electronic notice via the Electronic Court Filing system and on K&L Gates LLP, Attn: Jeffrey R. Fine, 1717 Main Street, Suite 2800, Dallas, Texas, 75201, (f) 214.939.5849, via first class United States mail, postage prepaid and facsimile.

/s/ Daniel C. Stewart

One of Counsel