

Motion by MLB Seeking to Force Frank McCourt to Sell Los Angeles Dodgers

Written by Maury Brown

Saturday, 24 September 2011 10:10

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE	
In re	Chapter 11
LOS ANGELES DODGERS LLC, et al., ¹	Case No. 11-1217 (M)
Debtor.	(Jointly Administered)
	Objection Deadline: October 6, 2011 at 4:00 pm Hearing Date: October 11, 2011 at 10:00 a.m.

**MOOTION OF MAJOR LEAGUE BASEBALL TO
TERMINATE EMERGENCY ORDER AND ALTERNATIVE
TO COMPEL THE DEBTORS TO REEL ASSUMPTION
OBLIGATIONS OF THE BUREAU OF BUREAU**

The Office of the Commissioner of Baseball, doing business as Major League Baseball ("Major League Baseball" or the "League"), hereby returns this motion (the "Motion") to process to section 1121(b) of title 11 of the United States Code, 11 U.S.C. §§ 1121, et seq. (the "Bankruptcy Code"), to terminate the exclusive period during which the Los Angeles Dodgers LLC ("LAD") and its affiliated debtors and debtors in possession (collectively, with LAD, the "Debtors") in the above-captioned chapter 11 case (the "Chapter 11 Case") may file a chapter 11 plan and solicit votes thereon,² or (b) in the alternative, pursuant to section 305(b)(2) of the Bankruptcy Code and Rule 6004 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), compelling the Debtors to seek assumption or rejection of the

¹ The Debtors, together with the list of the Debtors' listed and identified creditors are: Los Angeles Dodgers LLC (11-1217); Los Angeles Dodgers Holdings Company LLC (11-1217); Los Angeles Dodgers LLC (11-1217); Los Angeles Dodgers Holdings Company LLC (11-1217); and Los Angeles Dodgers LLC (11-1217). The Debtors of the Debtors' corporate headquarters and the service address for the Debtors is 1100 Olympic Blvd. in Los Angeles, California 90015.

² Major League Baseball previously requested to request a request to the Debtors for its contents of the same period of exclusivity to have Chapter 11 (Case No. 11-1217) without prejudice to future (single) motions to request to seek, or any other, to terminate the period of the order during its filing in any motion seeking to terminate motion to discharge the agreement between the parties. Major League Baseball hereby declines its prior agreement not to request to return the order to the Debtors to terminate the order.

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[\(79 pages partially redacted - PDF\)](#)