

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

In re:

SPORTS AUTHORITY HOLDINGS, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 16-10527 (MFW)

(Jointly Administered)

Ref. Docket Nos. 7 & 131

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' MOTION FOR FINAL ORDER (A) AUTHORIZING THE PAYMENT OF CERTAIN PREPETITION TAXES AND FEES, AND (B) AUTHORIZING BANKS TO RECEIVE, PROCESS, AND HONOR CHECKS ISSUED AND ELECTRONIC PAYMENT REQUESTS RELATED THERETO**

On March 2, 2016 (the "Petition Date"), Sports Authority Holdings, Inc. and its affiliated debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "Debtors") filed the *Debtors' Motion for Entry of Interim and Final Orders (A) Authorizing the Payment of Certain Prepetition Taxes and Fees, and (B) Authorizing Banks to Receive, Process, and Honor Checks Issued and Electronic Payment Requests Related Thereto* [Docket No. 7] (the "Motion").<sup>2</sup> Attached as Exhibit B to the Motion was a proposed form of order (the "Proposed Final Order") approving the relief requested in the Motion on a final basis.

On March 3, 2016, the Court held a hearing (the "Hearing") to, among other things, consider the interim relief requested in the Motion. While presenting the Motion to the Court, the Debtors' undersigned counsel made the representation that the Debtors do not have any past-due taxes or fees and, accordingly, the Debtors were not seeking authority to satisfy any such prepetition amounts related to past-due taxes or fees in connection with the Motion. At the

<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.

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Motion.



conclusion of the Debtors' presentation, the Court authorized the Debtors, in the exercise of their reasonable business judgment, to pay and remit to the Taxing Authorities the Taxes or Fees (as defined in the Motion) as they come due in the ordinary course of business, in an amount not to exceed \$18 million (the "Interim Cap"). An order approving the interim relief, on the terms described herein, was entered on March 3, 2016. See Docket No. 131 (the "Interim Order").

Following the Hearing and entry of the Interim Order, the Debtors learned that approximately \$150,000 in Fees were past due as of the Petition Date, and approximately \$184,000 in property taxes were, similarly, past-due (together, the "Past-Due Amounts"). In the interest of correcting the record from the Hearing and clarifying the relief sought in the Proposed Final Order, the Debtors hereby disclose these Past-Due Amounts. The Debtors further submit that satisfaction of these Past-Due Amounts will not cause the Debtors to exceed the Interim Cap imposed by the Interim Order, and, accordingly, payments related thereto are non-prejudicial and consistent with the interim relief obtained at the Hearing.

A hearing to consider the Proposed Final Order is scheduled to take place on March 29, 2016 at 1:00 p.m. (ET), at which time the Debtors will address any questions the Court has regarding the Past-Due Amounts and final relief sought in the Motion. Until the Proposed Final Order has been entered, the Debtors will not make any payments related to the Past-Due Amounts.

Dated: March 15, 2016  
Wilmington, Delaware

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