

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
SPORTS AUTHORITY HOLDINGS, INC.,)	
<i>et al.</i>)	Case No.: 16-10527 (MFW)
)	
Debtors.)	(Jointly Administration Requested)
)	
)	
)	Objection Date: March 22, 2016 at 4:00pm
)	
)	Hearing Date: March 29, 2016 at
)	1:00 p.m.
)	
)	Ref. Docket Nos. 15 and 156
)	

JOINDER OF LANDLORD H.I.R. 3 AND RH TACOMA PLACE ASSOCIATES, LLC TO LIMITED OBJECTION OF LEVIN MANAGEMENT CORPORATION AS AGENT FOR IKEA PROPERTIES, INC. TO 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) APPROVING DISPUTE RESOLUTION PROCEDURES, AND (E) APPROVING THE DEBTORS’ STORE CLOSING PLAN

PLEASE TAKE NOTICE that H.I.R. 3 and RH Tacoma Place Associates, LLC, tenants-in-common (“H.I.R.”), as creditors and landlord of debtor TSA Stores, Inc. by virtue of a certain *Lease Agreement*, as amended and restated with respect to real property commonly known as Tacoma Place Shopping Center, located 1901 South 72nd Street, Tacoma Washington, by and through its undersigned counsel, hereby gives notice that it joins and adopts the points and authorities offered by: (1) Levin Management Corporation as agent for Ikea Properties, Inc.; and (2) any other creditors or landlords that have filed or may file similar objections (collectively, the “Landlords”), in support of their Limited Objections to the Debtors’ emergency motion to assume



closing store agreements [Doc 15] (the “Landlord Objections”), *e.g.* Doc 625, *et al.* H.I.R. hereby joins in the Landlord Objections in all respects.

RESERVATION OF RIGHTS

H.I.R. submits this Joinder without prejudice to, and with full reservation of, H.I.R.’S rights to supplement this Joinder in advance of or in connection with the hearing on the Motion [Doc 15]. H.I.R. reserves (and nothing herein shall constitute a waiver, expressly or implicitly, of) all rights under the Bankruptcy Code or applicable non-bankruptcy law (including, and subject to the terms of the Lease Agreement). H.I.R. further reserves (and nothing herein shall constitute a waiver, expressly or implicitly, of) all rights to introduce or otherwise use any and all evidence elicited through discovery in the above-captioned case in support of any of the objections raised herein or by supplement to this Joinder and all rights regarding substantive sale objections and the cure costs associated with Lease Agreement.

WHEREFORE, for the foregoing reasons, H.I.R. respectfully requests that the Court enter an Order granting relief consistent with the foregoing and grant such other and further relief as is right and just.

Date: March 22, 2016

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Counsel for Landlord H.I.R. 3 and RH Tacoma
Place Associates, LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 22, 2016, I electronically served true and correct copies of the foregoing *Joinder of Landlord H.I.R. 3 And RH Tacoma Place Associates, LLC to Limited Objection of Levin Management Corporation as Agent for Ikea Properties, Inc. to 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) Approving Dispute Resolution Procedures, and (E) Approving The Debtors' Store Closing Plan* upon the parties listed on the attached service list via CM/ECF and First Class Mail, postage pre-paid.

HOGAN♦McDANIEL

/s/ Garvan F. McDaniel _____

Garvan F. McDaniel (DE # 4167)

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