

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

LOS ANGELES DODGERS LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 11-12010 (KG)

Jointly Administered

RE: D.I. 1252

STIPULATED ORDER RESOLVING (A) MOTION OF LOS ANGELES DODGERS LLC FOR DISALLOWANCE OF CLAIMS ASSERTED BY BRYAN STOW, TYLER STOW AND TABITHA STOW; (B) MOTION OF BRYAN STOW FOR (I) ABSTENTION PURSUANT TO 28 U.S.C. § 1334(c)(1) AND (II) RELIEF FROM THE AUTOMATIC STAY; AND (C) MOTIONS OF BRYAN STOW, TYLER STOW AND TABITHA STOW TO DEEM PROOFS OF CLAIM TIMELY FILED OR, IN THE ALTERNATIVE, GRANTING LEAVE TO FILE LATE CLAIMS

This stipulated order (the "Stipulated Order") is entered into by and between Los Angeles Dodgers LLC ("LAD"), LA Holdco LLC, LA Real Estate LLC, and LA Real Estate Holding Company LLC (together, the "Debtor Defendants"), and Bryan Stow, Tyler Stow, and Tabitha Stow (together, the "Claimants").

RECITALS

WHEREAS, on May 24, 2011, Claimants commenced a civil action (the "State Court Action") in the Superior Court of the State of California for the County of Los Angeles, Case No. BC462127 (the "Complaint") against more than a dozen defendants, including the Debtor Defendants;

WHEREAS, on June 27, 2011 (the "Commencement Date"), the Debtor Defendants,

¹ The Debtors, together with the last four digits of each Debtor's federal tax identification number are: Los Angeles Dodgers LLC (3133); Los Angeles Dodgers Holding Company LLC (4851); LA Holdco LLC (2567); LA Real Estate Holding Company LLC (4850); and LA Real Estate LLC (3029). The location of the Debtors' corporate headquarters and the service address for the Debtors is: 1000 Elysian Park Avenue, Los Angeles, California 90012.

along with debtor Los Angeles Dodgers Holding Company LLC (together with the Debtor Defendants, the "Debtors"), filed voluntary bankruptcy petitions in this Court under chapter 11 of the Bankruptcy Code, commencing the Debtors' bankruptcy proceedings (the "Cases"), the effect of which was to automatically stay the State Court Action as to the Debtor Defendants but not the other defendants in the State Court Action;

WHEREAS, on July 11, 2011, Bryan Stow, Tyler Stow, and Tabitha Stow (the "Claimants") filed Claim No. 13 in Case No. 11-12010 (the "Stow Claim"); and

WHEREAS, on February 3, 2012, LAD filed the *Motion of Los Angeles Dodgers for Disallowance of Claims Asserted by Bryan Stow* (the "Disallowance Motion") [D.I. 1252], together with various declarations and exhibits; and

WHEREAS, on February 22, 2012, Mr. Stow filed the *Motion of Bryan Stow for Stay of the Motion of Los Angeles Dodgers LLC for Disallowance of Claims Pending Disposition of His Motion for Abstention and Relief from the Automatic Stay* (the "Stay Motion") [D.I. 1377], the *Motion of Bryan Stow for (I) Abstention Pursuant to 28 U.S.C. § 1334(c)(1) and (II) Relief from the Automatic Stay* (the "Abstention Motion") [D.I. 1383], the *Motion of Bryan Stow to Deem Proofs of Claim Timely Filed or, in the Alternative, Granting Leave to File Late Claims* (the "Bryan Stow Deemed Filed Claim Motion") [D.I. 1388], and the *Opposition of Bryan M. Stow to Motion of Los Angeles Dodgers LLC for Disallowance of Claims Asserted by Bryan Stow, Tyler Stow, and Tabitha Stow* [D.I. 1356] (the "Opposition to Disallowance Motion"), along with numerous declarations and exhibits in support of the Opposition to Disallowance Motion;

WHEREAS, on February 22, 2012, Tyler Stow and Tabitha Stow filed joinders to the Abstention Motion, the Deemed Filed Claim Motion, and the Opposition to Disallowance Motion ("Joinders");

WHEREAS, on March 2, 2012, Tyler Stow and Tabitha Stow filed their Motion of Tyler Stow and Tabitha Stow to Deem Proofs of Claim Timely Filed, or in the Alternative, Granting Leave to File Late claims [D.I. 1457] (together with the Bryan Stow Deemed Filed Claim, the "Deemed Filed Claims Motions");

WHEREAS, on March 2, 2012, this Court entered a Scheduling Order [D.I. 1452], under which the Claimants have, in connection with the Opposition to Disallowance Motion, requested and obtained discovery from the Debtors pursuant to document requests, interrogatories, and depositions;

WHEREAS, the Debtors have designated certain documents and information produced through discovery as confidential, and the Debtors and Claimants have exchanged drafts of a protective order governing the use of confidential documents;

WHEREAS, on March 13, 2012, the Debtors provided the Claimants (through their counsel) with copies of seventeen (17) insurance policies (the "Insurance Policies"), attached hereto as Exhibits I-17 (and filed under seal);

WHEREAS, each of the current defendants in the State Court Action (the "Defendants") is an Insured under the Insurance Policies;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND ORDERED AS FOLLOWS:

1. The Court hereby abstains from hearing the Disallowance Motion, which is withdrawn without prejudice.
2. The Court hereby lifts the automatic stay to allow the Claimants to prosecute their claims against the Debtor Defendants in the State Court Action, provided, that any discovery or other proceedings in the State Court Action against any of the Defendants shall be stayed and enjoined until the Effective Date of the Debtors' Plan of Reorganization, as amended (the "Plan") [D.I. 1323].

3. The Stow Claim shall be deemed to be filed timely against each of the Debtor Defendants.

4. The Claimants shall not recover any money or other property on account of their claims and causes of action that have been or might be alleged against any Defendant (including the Debtor Defendants and non-debtor Defendants or any other affiliate of the Defendants), other than amounts paid by insurers pursuant to the Insurance Policies. Without limiting the generality of the foregoing, Claimants waive any right to seek recovery against any of the Defendants (or any affiliate of the Defendants) from any source other than the insurers pursuant to the Insurance Policies. For avoidance of doubt, nothing in the Plan, any order confirming the Plan, nor these Cases shall operate to preclude or enjoin the Claimants from prosecuting the claims and causes of action against the Defendants in the State Court Action or seeking recovery of amounts paid by insurers pursuant to the Insurance Policies.

5. Notwithstanding Section 3.2(c)(ii) of the Plan or anything else in these Cases, the Claimants shall not be precluded under the Plan from seeking to recover, solely from the insurers under the Insurance Policies, any pre-judgment interest at the rate provided under applicable California law.

6. Claimants agree not to file or otherwise assert any objection to the Plan, or objections to any further amendments to the Plan, provided that such amendments are not materially inconsistent with the express terms of this Stipulated Order, and hereby waive any such objections to the Plan.

7. Claimants shall be entitled to use any discovery obtained in connection with the Disallowance Motion in the State Court Action, subject to (i) any specific objections asserted to deposition questions, requests for production or interrogatories made during the course of

discovery and (ii) reasonable protections agreed to by the Claimants and Debtors (or, if agreement cannot be reached, as ordered by this Court) governing documents or information that have been designated by Debtors as confidential.

8. Nothing in these Cases shall limit the Claimants' ability to take discovery in the State Court Action after the Effective Date of the Plan, and Claimants shall be entitled to take depositions in the State Court Action of persons deposed in these Cases with respect to issues not raised by the Disallowance Motion or based on subsequently discovered or produced facts or documents.

9. This Stipulated Order constitutes the entire understanding and agreement between the parties with respect to the subject matter hereof, and supersedes all prior and contemporaneous agreements, understandings, and negotiations between the parties with respect hereto. This Stipulated Order has been negotiated by the parties hereto and their respective counsel, and, accordingly, the language hereof shall not be construed for or against any party.

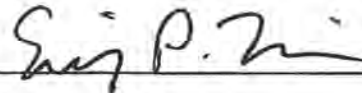
10. The non-debtor Defendants and their affiliates who are not parties to this Stipulated Order shall be deemed to be and are third party beneficiaries to this Stipulated Order.

11. The Claimants and Debtors shall each bear their own attorneys' fees and costs incurred in connection with the proceedings before this Court.

12. This Stipulated Order shall become effective upon this Court's approval and entry. The Claimants and Debtors agree to seek the Court's approval and entry of the Stipulated Order expeditiously.

Dated: March 16, 2012

By: _____



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Dated: March 19, 2012
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The Honorable Kevin Gross
Chief United States Bankruptcy Judge