

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

In re:)	Chapter 11
LOS ANGELES DODGERS LLC, <i>et al.</i> , ¹)	Case No. 11-12010 (KG)
Debtors.)	Joint Administration Requested
)	

NOTICE OF HEARING TO CONSIDER FIRST DAY PLEADINGS

PLEASE TAKE NOTICE that on June 27, 2011, Los Angeles Dodgers LLC and its affiliated debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors”) filed voluntary petitions for relief under chapter 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”), with the Clerk of the United States Bankruptcy Court for the District of Delaware (the “Court”). The Debtors continue to operate their business and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that the Debtors will present the following motions (collectively, the “First Day Motions”) at a hearing on **June 28, 2011 at 1:30 p.m. (ET)** (the “First Day Hearing”) before the Honorable Kevin Gross, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 6th Floor, Courtroom No. 3, Wilmington, Delaware 19801:

1. Debtors’ Motion for an Order Directing Joint Administration of the Debtors’ Chapter 11 Cases [Docket No. 3]

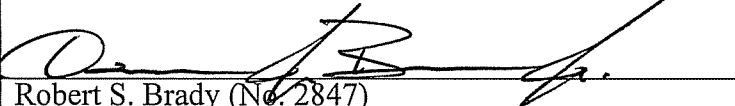
¹ The Debtors, together with the last four digits of each Debtor’s federal tax identification number are: Los Angeles Dodgers LLC (3133); Los Angeles Dodgers Holding Company LLC (4851); LA Holdco LLC (2567); LA Real Estate Holding Company LLC (4850); and LA Real Estate LLC (3029). The location of the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

2. Los Angeles Dodgers LLC and LA Real Estate LLC's Motion Pursuant to Sections 105(a), 363(c), and 345(b) of the Bankruptcy Code for Order: (A) Authorizing Continued Use of Cash Management System and Procedures; (B) Authorizing Maintenance and Continued Use of Existing Bank Accounts and Waiver of Certain Operating Guidelines Relating to Bank Accounts and the Requirements of Section 345 of the Bankruptcy Code; (C) Authorizing the Banks to Honor Certain Prepetition Checks; and (D) Granting Related Relief [Docket No. 5]
3. Los Angeles Dodgers LLC's Motion for Interim and Final Orders (I) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Utility Services, (II) Approving Los Angeles Dodgers LLC's Proposed Form of Adequate Assurance, (III) Establishing Procedures for Resolving Objections Thereto by Utility Companies, and (IV) Scheduling a Final Hearing Thereon [Docket No. 6]
4. Los Angeles Dodgers LLC's Motion for Authority to (A) Continue Its Workers' Compensation, Liability, Property, and Other Insurance Programs and (B) Pay All Obligations in Respect Thereof [Docket No. 7]
5. Los Angeles Dodgers LLC's Motion for Order Authorizing Payment of Certain Prepetition Taxes and Other Government Assessments Pursuant to Sections 105(a), 363(b), 507(a) and 541 of the Bankruptcy Code [Docket No. 8]
6. Los Angeles Dodgers LLC's Motion for (I) Authority to Pay Prepetition (a) Wages, Compensation, Payroll Taxes, and Employee Benefits, (b) Business Expenses, and (c) Contributions to, and Under, Employee Benefit Plans, (II) Authority to Pay Prepetition Benefits Providers, and (III) Authorizing Financial Institutions to Honor and Process Checks and Transfers Related to Such Obligations [Docket No. 9]
7. Los Angeles Dodgers LLC's Motion for Authority to Honor Prepetition Obligations to Customers and Otherwise Continue Customer Programs in the Ordinary Course of Business [Docket No. 10]
8. Los Angeles Dodgers LLC's Motion for Authority to Pay the Prepetition Claims of Certain Critical Vendors [Docket No. 11]
9. Los Angeles Dodgers LLC's Motion for Authority to Perform All Obligations under Collective Bargaining Agreements [Docket No. 12]
10. Emergency Motion for Interim and Final Orders (I) Authorizing Debtors to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 362, and 364, and (II) Scheduling a Final Hearing Pursuant to Bankruptcy Rules 4001(b) and 4001(c) [Docket No. 13]

PLEASE TAKE FURTHER NOTICE that copies of all of the First Day

Motions will be mailed to you subsequent to the First Day Hearing and are currently available on

the Court's website (www.deb.uscourts.gov). If you would like to receive copies of any of the First Day Motions prior to the First Day Hearing, you may contact Michael V. Girello, Paralegal, at (302) 571-6600 or MGirello@ycst.com. All parties wishing to participate in the First Day Hearing telephonically must make arrangements with Court Call by telephone at (866) 582-6878, by facsimile at (866) 533-2946, or on the internet at www.courtcall.com.

<p>Dated: June 27, 2011 Wilmington, Delaware</p>	<p>YOUNG CONAWAY STARGATT & TAYLOR, LLP</p>  <p>Robert S. Brady (No. 2847) Donald J. Bowman, Jr. (No. 4383) Ryan M. Bartley (No. 4985) The Brandywine Building – 17th Floor 1000 West Street, Post Office Box 391 Wilmington, Delaware 19899 Telephone: (302) 571-6600 Facsimile: (302) 571-1253</p> <p>-and-</p> <p>DEWEY & LEBOEUF LLP Bruce Bennett Sidney P. Levinson <i>(pro hac vice applications forthcoming)</i> 333 South Grand Avenue, Suite 2600 Los Angeles, California 90071 Telephone: (213) 621-6000 Facsimile: (213) 621-6100</p> <p>-and-</p> <p>DEWEY & LEBOEUF LLP Martin J. Bienenstock Philip M. Abelson <i>(pro hac vice applications forthcoming)</i> 1301 Avenue of the Americas New York, New York 10019 Telephone: (212) 259-8000 Facsimile: (212) 259-6333</p> <p><i>Proposed Co-Counsel for LAD and LAD in Possession</i></p>
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