

EXHIBIT A

Proposed Order

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

In re:) Chapter 11
LOS ANGELES DODGERS LLC) Case No. 11- _____ (____)
Debtor.) (Joint Administration Pending)

In re:) Chapter 11
LOS ANGELES DODGERS HOLDING) Case No. 11- _____ (____)
COMPANY LLC) (Joint Administration Pending)
Debtor.)

In re:) Chapter 11
LA HOLDCO LLC) Case No. 11- _____ (____)
Debtor.) (Joint Administration Pending)

In re:) Chapter 11
LA REAL ESTATE HOLDING COMPANY) Case No. 11- _____ (____)
LLC) (Joint Administration Pending)
Debtor.)

In re:) Chapter 11
LA REAL ESTATE LLC) Case No. 11- _____ (____)
Debtor.) (Joint Administration Pending)

**ORDER DIRECTING JOINT ADMINISTRATION OF THE DEBTORS'
CHAPTER 11 CASES AND GRANTING RELATED RELIEF**

Upon the Motion¹ of Los Angeles Dodgers LLC and its affiliated debtors and debtors-in-possession in the above-captioned cases (each a “Debtor,” and collectively, the “Debtors”), requesting entry of an order pursuant to section 105(a) of title 11 of the Bankruptcy Code, Rule 1015(b) of the Bankruptcy Rules and Local Rule 1015-1, administratively consolidating their respective chapter 11 cases for procedural purposes only and providing for joint administration; and upon consideration of the *Declaration of Jeffrey J. Ingram in Support of Debtors’ Chapter 11 Petitions and First Day Motions*; and it appearing that this Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that venue of these cases and the Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that notice of the Motion has been given as set forth in the Motion and that such notice is adequate and no other or further notice need be given; and a hearing having been held to consider the relief requested in the Motion and upon the record of the hearing and all of the proceedings had before the Court; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors, their estates, their creditors and all other parties-in-interest; and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED that:

1. The Motion is GRANTED.
2. Pursuant to section 105(a) of the Bankruptcy Code, Bankruptcy Rule 1015(b) and Local Rule 1015-1, the above-captioned Chapter 11 Cases shall be consolidated for administrative purposes only and jointly administered as Case No. 11-____ (____).

¹ All capitalized terms used and not defined herein shall have the meanings ascribed to them in the Motion.

3. The following caption shall be used for all pleadings filed in the above-referenced cases:

**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-____ (___)
)	
Debtors.)	Jointly Administered
)	

FN 1: The Debtors in these cases, along with the last four digits of each Debtor's 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 mailing address for Los Angeles Dodgers LLC is 1000 Elysian Park Avenue, Los Angeles, CA 90012.

4. A docket entry shall be made in each of the above-referenced Chapter 11 Cases, other than the docket maintained for the chapter 11 case of Los Angeles Dodgers LLC, substantially as follows:

“An Order has been entered in this case under Rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing the procedural consolidation and joint administration of the chapter 11 cases of Los Angeles Dodgers LLC, Los Angeles Dodgers Holding Company LLC, LA Holdco LLC, LA Real Estate Holding Company LLC, and LA Real Estate LLC. All further pleadings and other papers shall be filed in, and all further docket entries shall be made in the docket of Los Angeles Dodgers LLC, Case No. 11-____ (___) and such docket should be consulted for all matters affecting this chapter 11 case.”

5. One consolidated docket, one file and one consolidated service list shall be maintained for the Chapter 11 Cases by the Debtors and kept by the Clerk of the United States Bankruptcy Court for the District of Delaware.

6. Notwithstanding any provision in the Bankruptcy Rules to the contrary:
(a) this Order shall be effective immediately and enforceable upon its entry; (b) the Debtors are

not subject to any stay in the implementation, enforcement or realization of the relief granted in this Order; and (c) the Debtors are authorized and empowered, and may in their discretion and without further delay, take any action and perform any act necessary to implement and effectuate the terms of this Order.

7. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Motion or the implementation of this Order.

Dated: June _____, 2011
Wilmington, Delaware

UNITED STATES BANKRUPTCY JUDGE