

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:)	
)	Chapter 11
Philadelphia Newspapers, LLC, <i>et al.</i> , ¹)	Case No. 09-11204 (SR)
)	
Debtors.)	Jointly Administered
)	

**STATEMENT OF ISSUE PRESENTED AND DESIGNATION OF RECORD ON
APPEAL BY PHILADELPHIA NEWSPAPERS, LLC, *ET AL.*, WITH RESPECT TO
THEIR APPEAL FROM THAT ORDER, ENTERED BY THE BANKRUPTCY COURT
ON FEBRUARY 4, 2010, DENYING THE DEBTORS’ MOTION FOR ENTRY OF AN
ORDER COMPELLING THE STEERING GROUP OF PREPETITION LENDERS
TO COMPLY WITH FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the above-captioned debtors and debtors in possession (collectively, the “Debtors”), by and through their undersigned counsel, hereby designate the record and issue presented on appeal to the United States District Court for the Eastern District of Pennsylvania from that certain *Order Denying the Debtors’ Motion for Entry of an Order Compelling the Steering Group of Prepetition Lenders to Comply with Federal Rule of Bankruptcy Procedure 2019* (the “Rule 2019 Motion”) [*Docket No. 1680*] entered by the Honorable Stephen Raslavich of the United States Bankruptcy Court for the Eastern District of Pennsylvania (the “Bankruptcy Court”) on February 4, 2010.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: PMH Acquisition, LLC (1299), Broad Street Video, LLC (4665), Philadelphia Newspapers, LLC (3870), Philadelphia Direct, LLC (4439), Philly Online, LLC (5185), PMH Holdings, LLC (1768), Broad Street Publishing, LLC (4574), Philadelphia Media, LLC (0657) and Philadelphia Media Holdings, LLC (4680).

Statement of Issue Presented on Appeal

Whether the Bankruptcy Court erred as a matter of fact and law in denying the motion to compel the Steering Group of Prepetition Lenders, which has repeatedly participated in these proceedings *eo nomine*, to comply with Bankruptcy Rule 2019(a), on the sole ground that the Steering Group is not an “entity or committee representing more than one creditor” within the meaning of Bankruptcy Rule 2019(a).

Designation of Items to be Included in the Record on Appeal²

1. Notice of Appeal of to District Court of Order Denying the Debtors’ Motion for Entry of an Order Compelling the Steering Group of Prepetition Lenders to Comply with Federal Rule of Bankruptcy Procedure 2019 [*Docket No. 1684*].
2. Order Denying the Debtors’ Motion for Entry of an Order Compelling the Steering Group of Prepetition Lenders to Comply with Federal Rule of Bankruptcy Procedure 2019 [*Docket No. 1680*].
3. Opinion re: Debtors’ Motion for Entry of an Order Compelling the Steering Group of Prepetition Lenders to Comply with Federal Rule of Bankruptcy Procedure 2019 [*Docket No. 1679*].
4. Letter to The Honorable Stephen Raslavich re: Transcript of January 20, 2010 Hearing in *In re Accuride Corp.* Filed by the Debtors [*Docket No. 1676*].
5. Letter to The Honorable Stephen Raslavich re: Order Entered in *In re Accuride Corp.* Filed by the Debtors [*Docket No. 1650*].
6. Letter to Judge Raslavich re: Six Flags Opinion Filed on Behalf of the Steering Group of Prepetition Lenders [*Docket No. 1643*].
7. Letter to Judge Raslavich re: Debtors’ Motion to Compel Filed on Behalf of the Steering Group of Prepetition Lenders [*Docket No. 1632*].
8. Letter to Judge Raslavich re: Debtors’ Motion to Compel Filed on Behalf of the Steering Group of Prepetition Lenders [*Docket No. 1616*].

² Each designated item includes any exhibits to such item. Each reference to “[*Docket No. ____*]” includes all documents identified under that docket number.

9. Supplemental Objection of the Steering Group of Prepetition Secured Lenders to Debtors' Motion for Entry of an Order Compelling the Steering Group of Prepetition Lenders to Comply with Federal Rule of Bankruptcy Procedure 2019 [*Docket No. 1590*].
10. Debtors' Response to the Objection of the Steering Group of Prepetition Secured Lenders to Debtors' Motion for Entry of an Order Compelling the Steering Group of Prepetition Lenders to Comply with Federal Rule of Bankruptcy Procedure 2019 [*Docket No. 1589*].
11. Transcript re: Hearing Held on December 21, 2009 [*Docket No. 1567*].
12. Objection of the Steering Group of Prepetition Secured Lenders to Debtors' Motion for Entry of an Order Compelling the Steering Group of Prepetition Lenders to Comply with Federal Rule of Bankruptcy Procedure 2019 [*Docket No. 1551*].
13. Slip Opinion Cited in Debtors' Motion for Entry of an Order Compelling the Steering Group of Prepetition Lenders to Comply with Federal Rule of Bankruptcy Procedure 2019 [*Docket No. 1514*].
14. Notice of Date of Expedited Hearing, Matters that Will Be Heard at the Expedited Hearing and How to Respond Filed by the Debtors [*Docket No. 1513*].
15. Order Granting Expedited Hearing on Debtors' Motion for Entry of an Order Compelling the Steering Group of Prepetition Lenders to Comply with Federal Rule of Bankruptcy Procedure 2019 [*Docket No. 1509*].
16. Motion for Expedited Hearing on Debtors' Motion for Entry of an Order Compelling the Steering Group of Prepetition Lenders to Comply with Federal Rule of Bankruptcy Procedure 2019 [*Docket No. 1508*].
17. Debtors' Motion for Entry of an Order Compelling the Steering Group of Prepetition Lenders to Comply with Federal Rule of Bankruptcy Procedure 2019 [*Docket No. 1507*].
18. Objection of the Steering Group of Prepetition Secured Lenders and Citizens Bank of Pennsylvania, as Agent for the Prepetition Secured Lenders, to Application of Debtors for an Order Authorizing Employment and Retention of Sonenshine Partners LLC, as Financial Advisor and Investment Banker, *Nunc Pro Tunc* to February 26, 2009 [*Docket No. 336*].
19. Motion to Appear *pro hac vice* on behalf of Fred S. Hodara to represent the Steering Committee of Secured Creditors Filed by Citizens Bank of Pennsylvania, as Agent, Represented by Andrew Jay Flame [*Docket No. 127*].
20. Motion to Appear *pro hac vice* on behalf of Abid Qureshi to represent the Steering Committee of Secured Creditors Filed by Citizens Bank of Pennsylvania, as Agent, Represented by Andrew Jay Flame [*Docket No. 126*].

21. Motion to Appear *pro hac vice* on behalf of Stephen Baldini to represent the Steering Committee of Secured Creditors Filed by Citizens Bank of Pennsylvania, as Agent, Represented by Andrew Jay Flame [*Docket No. 125*].
22. Transcript re: First Day Hearing Held on February 24, 2009 [*Docket No. 81*].

Dated: February 12, 2010
Philadelphia, Pennsylvania

/s/ Anne M. Aaronson

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