

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

In re:	:	Chapter 11
	:	
Philadelphia Newspapers, LLC et al.,	:	Case No. 09-11204 (JKF)
	:	
Debtors.	:	Jointly Administered
In re:	:	
	:	
Philadelphia Media Holdings, LLC	:	Chapter 11
	:	
Debtor.	:	Case No. 09-14315 (JKF)

**RESPONSE OF MYRA BELLE MILLER
TO THE DEBTORS' MOTION FOR APPLICABILITY**

Myra Belle Miller, by and through her undersigned counsel, hereby avers as follows:

1. Respondent is Myra Belle Miller, the Plaintiff in a currently-pending libel matter against several predecessors of the Debtors.
2. The Philadelphia Newspapers, LLC Bankruptcy matter (Case No. 09-11204) was filed only days before oral argument was to be heard before the Pennsylvania Superior Court on Respondent's appeal of a judgment of the Court of Common Pleas of Philadelphia County dismissing her libel matter against the Debtors' predecessors.
3. The aforesaid libel matter had been fully briefed and was ready for argument at the time of the Philadelphia Newspapers bankruptcy.
4. Debtor Philadelphia Media Holdings filed a petition for relief under Chapter 11 of the United States Bankruptcy Code on or about June 10, 2009 at Case No. 09-14315.
5. Respondent is included in the List of Top 20 Creditors filed by Philadelphia Media Holdings.

6. Philadelphia Media Holdings has filed a Motion for Applicability to which Respondents Vahan H. Gureghian, Danielle Gureghian, and Charter School Management, Inc. have already filed a Response (*see* docket item 17 in case No. 09-14315).
7. Respondent hereby incorporates, supports, and joins in the opposition of Respondents Vahan H. Gureghian, Danielle Gureghian, and Charter School Management to the Motion for Applicability.
8. If the Motion for Applicability is granted, Respondent (like other litigation creditors) could suffer prejudice in that a separate Creditors' Committee will not be formed for Philadelphia Media Holdings.
9. The interests of litigation creditors may not be in line with the interests of the creditors currently represented in the Committee of Unsecured Creditors for Philadelphia Newspapers LLC.
10. Respondent also supports the forming of a separate Creditors' Committee for Philadelphia Media Holdings.

WHEREFORE, Respondent requests that the Motion for Applicability be DENIED.

Respectfully submitted,

TIMOTHY M. KOLMAN AND ASSOCIATES

By: /s/ Wayne A. Ely, Esquire
Wayne A. Ely, Esquire
Timothy M. Kolman, Esquire
414 Hulmeville Avenue
Penndel, PA 19047
Telephone: 215-750-3134
Facsimile: 215-750-3138
Attorneys for Defendant, Myra Belle Miller

June 15, 2009