

**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

MOTION FOR EXPEDITED HEARING

The above-captioned debtors (collectively, the “Debtors”) hereby move the Court, pursuant to this motion (this “Motion”), for the entry of an order, substantially in the form attached hereto as **Exhibit A**, scheduling an expedited hearing on the Debtors’ Objection and Motion to Dismiss Vahan H. Gureghian, Danielle Gureghian, and Charter School Management, Inc.’s Requests for Allowance of Administrative Claims (the “CSMI Claims Objection”). In support of this Motion, the Debtors respectfully state as follows:

Jurisdiction

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).
2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The statutory bases for the relief requested herein are section 105(a) of the Bankruptcy Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), Rules 3007, 9006(c) and (d), and 9007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rules 3007-1 and 5070-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Eastern District of Pennsylvania (the “Local Rules”).

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).

Background

4. On February 22, 2009 (the "Petition Date"), each of the Debtors, except Philadelphia Media Holdings, LLC, filed a voluntary petition for relief with the Court under chapter 11 of title 11 of the Bankruptcy Code. On June 10, 2009, the Debtor, Philadelphia Media Holdings, LLC, filed a voluntary petition for relief with the Court under chapter 11 of title 11 of the Bankruptcy Code. The Debtors are operating their business and managing their property as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. On August 2, 2010, Vahan H. Gureghian, Danielle Gureghian, and Charter School Management, Inc. (collectively, "CSMI") filed with the Debtors' claims agent certain requests for allowance of administrative claims in the approximate amount of \$1.9 million.

Relief Requested

6. By this Motion, the Debtors seek entry of an Order scheduling an expedited hearing on the CSMI Claims Objection.

Basis for Relief

7. Because the CSMI requests seek significant sums of money in the form of administrative expense claims, the Debtors and PN Purchaser Co., LLC (the "Purchaser") must have resolution of claims such as CSMI's in order for the sale contemplated by the confirmed plan to close.

8. The sale of substantially all of the Debtors' assets to Purchaser is scheduled to close on August 31, 2010. Resolution of the CSMI Claims Objection before that date will aid all parties in effectuating that closing.

9. Therefore, the Debtors, together with the Purchaser (collectively, the "Plan Proponents"), request that the Court schedule a hearing on the CSMI Claims Objection in

conjunction with the other matters scheduled for hearing in these cases on August 26, 2010 at 10:30 a.m., or as soon thereafter as possible, but in any event not later than August 31, 2010.

Consultation and Notice

10. In accordance with Local Rule 5070-1 the Debtors have provided notice of this Motion to the United States Trustee for the Eastern District of Pennsylvania, the Official Committee of Unsecured Creditors, the Agent for the Senior Secured Lenders, and Counsel for the Steering Group of Senior Secured Lenders and Purchaser, and counsel for CSMI in these bankruptcy cases. Service will also be effected by electronic or overnight mail to parties who have requested service in these cases. In light of the nature of relief requested, the Debtors respectfully submit that no further notice is necessary.

WHEREFORE, the Debtors respectfully request entry of an order, substantially in the form attached hereto as **Exhibit A** scheduling a hearing on the CSMI Claims Objection for 10:30 a.m. (prevailing Eastern time) on August 26, 2010, or as soon thereafter as the Court may direct.

Dated: August 23, 2010
Philadelphia, Pennsylvania

/s/ Anne M. Aaronson

DILWORTH PAXSON LLP
Lawrence G. McMichael
Anne M. Aaronson
Catherine G. Pappas
1500 Market Street, Suite 3500E
Philadelphia, PA 19102
Telephone: (215) 575-7000
Facsimile: (215) 575-7200

-and-

PROSKAUER ROSE LLP
Mark K. Thomas
Paul V. Possinger
Peter J. Young
Three First National Plaza
70 W. Madison, Suite 3800
Chicago, Illinois 60602
Telephone: (312) 962-3550
Facsimile: (312) 962-3551

Co-Counsel for the Debtors and Debtors in Possession

Exhibit A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
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In re:)	Chapter 11
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Debtors.)	Jointly Administered

ORDER SCHEDULING EXPEDITED HEARING

Upon the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for the entry of an order (this “Order”) scheduling an expedited hearing on the CSMI Claims Objection; and it appearing that the relief requested therein is in the best interests of the Debtors’ estates, their creditors and other parties in interest; and it appearing that the Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and it appearing that this proceeding is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that venue of this proceeding is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that notice of the Motion and opportunity for a hearing on the Motion was appropriate under the particular circumstances and that no other or further notice need be given; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED that:

1. The Motion is granted as set forth herein.
2. A hearing will be held on the CSMI Claims Objection on August ____, 2010 at ____:____ a.m./p.m. (prevailing Eastern time) before the Honorable Stephen Raslavich, Chief

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² Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Motion.

United States Bankruptcy Judge, presiding at the Robert N.C. Nix, Sr. Federal Courthouse 900
Market Street, Philadelphia, PA 19107, courtroom 4.

Dated: August __, 2010
Philadelphia, Pennsylvania

Stephen Raslavich
Chief United States Bankruptcy Judge