

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

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

**PRELIMINARY OBJECTION OF CHARTER SCHOOL MANAGEMENT, INC.,
VAHAN H. GUREGHIAN, AND DANIELLE GUREGHIAN (CSMI PARTIES) TO THE
REQUEST OF THE DEBTORS FOR EXPEDITED CONSIDERATION ON THEIR
OBJECTION AND MOTION TO DISMISS THE CSMI PARTIES’ REQUEST FOR
ALLOWANCE OF ADMINISTRATIVE CLAIM**

Charter School Management, Inc. (“CSMI”), Vahan H. Gureghian (“Mr. Gureghian”), and Danielle Gureghian (“Mrs. Gureghian” or collectively with CSMI and Mr. Gureghian, the “CSMI Parties”), by and through undersigned counsel, Obermayer Rebmann Maxwell & Hippel LLP, hereby file this preliminary objection (the “Objection”) to the request for expedited consideration in the Debtors’ Objection and Motion to Dismiss the Request for Allowance of Administrative Claim of the CSMI Parties. In opposition to expedited consideration of the Objection, and the CSMI Parties hereby reserving all rights to oppose the substantive allegations in the Objection, the CSMI Parties state as follows:

1. CSMI hereby objects to the request for expedited consideration.
2. Dilworth and the Debtors did not comply with Local Rule 5070, in that they failed to seek the consent of the Movants for the expedited hearing.
3. Indeed, it was at 8:00 p.m. on August 23, 2010 that counsel to the CSMI Parties received a blithe e-mail from counsel to the Debtors indicating their desire to have expedited hearing a mere two business days following the filing of a nearly one hundred paragraph Objection, with exhibits which bring the page total to in excess of two hundred pages.

4. The Objection itself was filed a mere one hour later proving that the Debtors were in fact working on the Objection for a substantial period of time, yet asking for a hearing and providing a mere one hour notice before the late night filing.

5. Courtesy and the Local Rules require that that the Debtors not set up the CSMI Parties for a “blind side shot” attempting to knock out the Administrative Claims without a fair or adequate time to respond.

6. The e-mail from counsel simply says a hearing will be requested for the August 26, 2010 without inquiring about availability or consent.

7. The request does not comport with the Local Rules of this Court which require that the parties be given adequate notice and that the moving party consult with its opponents.

8. The expedited request is inherently unfair to the CSMI Parties, who unlike the Debtors who have been preparing papers apparently for days, have little realistic opportunity to meaningfully respond to such a voluminous pleading on such short notice.

9. Moreover, the issues raised in the Objections are significant legal and factual issues for which the CSMI Parties have insufficient time to respond. A hearing on little notice for matters of this magnitude offends notions of fair play, and denies the CSMI Parties’ due process in the prosecution of the Administrative Claims.

10. There are in fact weighty legal and factual issues surrounding the application of administrative status to post-petition injuries. The CSMI Parties aver that the great weight of authority supports the CSMI Parties’ Request for Administrative Claim. These issues will have to be briefed in a cogent and concise manner in order to assist the Court in this issue which is extremely significant to the CSMI Parties.

11. In addition, discovery of the Debtors' employees will be required to determine if the allegations of the Debtors in the Objection are supportable.

12. Finally at the hearing on the CSMI Parties' Objections to the Administrative Bar Date, Movants raised the lack of procedural safeguards and procedures with the Court. At that time the Court indicated that any procedures would be dealt with after the closing.

13. Apparently the Debtors now want the matters raised in the Administrative Claims to be dealt with on a shortened and expedited basis. They have ignored the numerous requests of the CSMI Parties to attempt to resolve the claims, refusing to indicate whether insurance would be available for these claims related to use of the Debtors' web site to further injure and defame the CSMI Parties.

14. The Debtors have lulled the CSMI Parties and now seek to leap on the CSMI Parties without a meaningful opportunity to address and respond to the Objections.

15. The CSMI Parties were careful in their description and quantification of their claims, and indicated, though filed in each case that there was one claim jointly held against the Debtors, and each of them, jointly and severally. A hearing on such short notice denies the CSMI Parties a meaningful day in court.

16. CSMI Parties hereby reserve all rights to oppose the substantive allegations in the Objection in a separate filing.

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WHEREFORE, the CSMI Parties respectfully request that this Court deny the Debtors' request for expedited consideration on the Objection.

Respectfully Submitted,

Dated: August 24, 2010

By: /s/ Edmond M. George, Esquire
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