

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

In re:  SPORTCO HOLDINGS, INC., <i>et al.</i> , <sup>1</sup> Debtors.	Chapter 11  Case No. 19-11299 (LSS) (Jointly Administered)  <b>Re: Docket No. 202</b>
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**AGREED-TO ORDER GRANTING THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION FOR AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 AND LOCAL BANKRUPTCY RULE 2004-1 DIRECTING THE EXAMINATION AND PRODUCTION OF DOCUMENTS BY WELLSRING CAPITAL MANAGEMENT LLC, WELLSRING CAPITAL PARTNERS IV, L.P., WCM GENPAR IV, L.P., WCM GENPAR IV GP, LLC, ALEXANDER E. CARLES, WILLIAM F. DAWSON, JR., AND JOHN E. MORNINGSTAR**

Upon consideration of The Official Committee of Unsecured Creditors' Motion for an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004-1 Directing the Examination and Production of Documents by Wellspring Capital Management LLC, Wellspring Capital Partners IV, L.P., WCM GenPar IV, L.P., WCM GenPar IV GP, LLC, Alexander E. Carles, William F. Dawson, Jr., and John E. Morningstar (collectively "**Wellspring**") (the "**Motion**"), and any responses thereto; and the Court having conducted a hearing on the Motion, and upon the record thereof; and after due deliberation thereon; and good and sufficient cause existing therefor, it is hereby

ORDERED, ADJUDGED, AND DECREED that:

1. The Motion is granted as set forth herein.

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<sup>1</sup> The Debtors, together with the last four digits of each Debtor's federal tax identification number, are: Bonitz Brothers, Inc. (4441); Ellett Brothers, LLC (7069); Evans Sports, Inc. (2654); Jerry's Sports, Inc. (4289); Outdoor Sports Headquarters, Inc. (4548); Quality Boxes, Inc. (0287); Simmons Guns Specialties, Inc. (4364); SportCo Holdings, Inc. (0355); and United Sporting Companies, Inc. (5758). The location of the Debtors' corporate headquarters and the service address for all Debtors is 267 Columbia Ave. Chapin, SC, 29036.

2. The Official Committee of Unsecured Creditors (the “**Committee**”) may examine Wellspring in accordance with Fed. R. Bankr. P. 2004(b) and, if necessary, seek to compel Wellspring’s compliance under Bankruptcy Rules 2004(c) and (d), as applicable.

3. Wellspring is directed to produce to the Committee all documents within its respective possession, custody, or control that are responsive to the categories set forth on Exhibits B-H attached to the Motion, using the agreed upon search criteria attached hereto as Exhibit A, on a rolling basis following the entry of this Order, with substantial completion of such productions to be completed no later than September 20, 2019 at 4:00 p.m. (Eastern), with production of such documents to begin no later than August 30, 2019 at 4:00 p.m. (Eastern) absent agreement of the Committee. A privilege log shall be produced by Wellspring to the Committee no later than September 27, 2019 at 4:00 p.m. (Eastern).

4. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be deemed as a waiver of Wellspring’s rights under applicable law to (i) withhold documents on the basis of privilege, (ii) seek an order protecting the disclosure of confidential documents, or (iii) object to the proposed list of topics for the examination of any Wellspring representative to the extent such topics are not consistent with the scope of the Committee’s requests for production.

5. This Court shall retain jurisdiction to resolve any disputes arising from or related to this Order, and to interpret, implement, and enforce the provisions of this Order.

Dated: September 12th, 2019  
Wilmington, Delaware



LAURIE SELBER SILVERSTEIN  
UNITED STATES BANKRUPTCY JUDGE