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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

SPORTCO HOLDINGS, INC., et al., 1

Debtors.

Chapter 11

Case No. 19-11299 (LSS) (Jointly Administered)

Re. Docket Nos. 330 & 375

CERTIFICATION OF COUNSEL REGARDING *PROPOSED* ORDER AUTHORIZING THE SALE OF MISCELLANEOUS ASSETS OUTSIDE THE ORDINARY COURSE OF BUSINESS FREE AND CLEAR OF ALL LIENS, CLAIMS, INTERESTS AND ENCUMBRANCES PURSUANT TO SECTION 363 OF THE BANKRUPTCY CODE

The undersigned hereby certifies as follows:

- 1. On September 11, 2019, the United States Bankruptcy Court for the District of Delaware (the "Court") entered that certain *Order Establishing Procedures for Sales of Certain Miscellaneous Assets Outside the Ordinary Course of Business Free and Clear of All Liens, Claims, Interests and Encumbrances Pursuant to Section 363 of the Bankruptcy Code* [Docket No. 375] (the "Miscellaneous Asset Sale Procedures Order"), whereby the Court authorized the Miscellaneous Asset Sale Procedures set forth in greater detail therein.
- 2. On September 18, 2019, the Debtors provided notice to the Notice Parties of their intention to sell certain Miscellaneous Assets (the "Sale Transaction") to Myron Bowling Auctioneers, Inc. (the "Buyer") pursuant to Paragraph 2(a) of the Miscellaneous Asset Sale Procedures Order.

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¹ 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 Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Miscellaneous Asset Sale Procedures Order.

- 3. Pursuant to Paragraph 2(a) of the Miscellaneous Asset Sale Procedures Order, objections or responses to the Sale Transaction by Notice Parties were due on or before September 23, 2019 (the "Objection Deadline"). No objections were received by the Objection Deadline.
- 4. The Debtors have prepared a proposed form of order (the "**Proposed Order**"), attached hereto as **Exhibit A**, authorizing and approving the Sale Transaction pursuant to the Miscellaneous Asset Sale Procedures Order.
- 5. The Debtors respectfully request that the Proposed Order be entered at the earliest convenience of the Court without further notice or a hearing.

Dated: September 24, 2019 Wilmington, Delaware Respectfully submitted,

POLSINELLI PC

/s/ Christopher A. Ward

Christopher A. Ward (Del. Bar No. 3877) Brenna A. Dolphin (Del. Bar No. 5604) 222 Delaware Avenue, Suite 1101 Wilmington, Delaware 19801 Telephone: (302) 252-0920

Facsimile: (302) 252-0921 cward@polsinelli.com bdolphin@polsinelli.com

-and-

McDERMOTT WILL & EMERY LLP

Timothy W. Walsh (admitted *pro hac vice*)
Darren Azman (admitted *pro hac vice*)
Riley T. Orloff (admitted *pro hac vice*)
340 Madison Avenue

New York, New York 10173-1922 Telephone: (212) 547-5400 Facsimile: (212) 547-5444 Email: twwalsh@mwe.com

dazman@mwe.com rorloff@mwe.com

Counsel to the Debtors and Debtors in Possession