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

In re:

SPORTCO HOLDINGS, INC., et al.,

Debtors.

Chapter 11

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

## **ADMINISTRATIVE CLAIM**

Bradley Johnson, (the "<u>Claimant</u>"), by and through his undersigned counsel, hereby asserts an Administrative Claim against the Debtor Sportco Holdings, Inc. (the "<u>Debtor</u>"). Mr. Johnson is a former Chief Executive Officer of the Debtor. Mr. Johnson has a contingent claim under Delaware law, the Debtor's by-laws, and/or the Debtor's certificate of incorporation for advancement and indemnification of any losses he has incurred or may incur, including attorneys' fees and costs, in connection with that litigation known as *Prospect Capital Corp. v. Wellspring Capital Management LLC*, et. al., Case No. 2019CP3202045, now pending in the Eleventh Judicial Circuit Court of the State of South Carolina, to the extent that such losses are not covered by available insurance proceeds. At present, insurance is covering his costs with respect to that action. Therefore, the claim is, at present, unliquidated.

Dated: October 7, 2019 Wilmington, Delaware

CROSS & SIMON, LLC

By: <u>/s/ Joseph Grey</u> Joseph Grey (No. 2358) 1105 North Market Street, Suite 901 Wilmington, Delaware 19801 (302) 777-4200 (302) 777-4224 (Facsimile) jgrey@crosslaw.com

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