

At IAS Part 41 of the Supreme Court of the State of New York, held in and for the County of New York, at the Courthouse located at 60 Centre Street, New York, New York, on this ____ day of August, 2014.

P R E S E N T:

HONORABLE LAWRENCE MARKS,

Justice.

TCR SPORTS BROADCASTING HOLDING, LLP,

Petitioner,

-against-

WN PARTNER, LLC; NINE SPORTS HOLDING, LLC;
WASHINGTON NATIONALS BASEBALL CLUB, LLC;
THE OFFICE OF COMMISSIONER OF BASEBALL; and
THE COMMISSIONER OF MAJOR LEAGUE
BASEBALL,

Respondents,

-and-

THE BALTIMORE ORIOLES BASEBALL CLUB and
BALTIMORE ORIOLES LIMITED PARTNERSHIP, in its
capacity as managing partner of TCR SPORTS
BROADCASTING HOLDING, LLP,

Nominal Respondents.

Index No. 652044/14
(IAS Part 41)

**ORDER TO SHOW CAUSE
WITH TEMPORARY
RESTRAINING ORDER**

UPON reading and filing (1) the Affirmation of in Support of Application for Temporary Restraining Order and Motion for Preliminary Injunction, dated August 7, 2014, and the exhibits annexed thereto, including the Verified Petition to Vacate Arbitration Award, dated July 28, 2014, the Arbitration Award of the Revenue Sharing Definitions Committee of Major League Baseball dated June 30, 2014, the Settlement Agreement dated March 28, 2005 by and among

the Office of the Commissioner of Baseball d/b/a Major League Baseball, TCR Sports Broadcasting Holding, LLP, Baseball Expos, LP d/b/a Washington Nationals Baseball Club, and the Baltimore Orioles Limited Partnership (the "Settlement Agreement"); (2) the accompanying Memorandum of Law in Support of Petitioner's Application for a Temporary Restraining Order and Motion for a Preliminary Injunction; (3) the Affidavit of Michael J. Haley, sworn July 25, 2014; (4) the Declaration of Hal J. Singer, Ph.D., sworn July 2, 2014; (5) the Affidavit of Hal J. Singer, Ph.D., sworn July 18, 2014; (6) the Affidavit of Mark C. Wyche, sworn July 22, 2014 and sufficient cause appearing therefore,

NOW, Upon application of Chadbourne & Parke LLP, attorneys for Petitioner TCR Sports Broadcasting Holding LLP, d/b/a Mid-Atlantic Sports Network ("TCR" or "MASN"),

IT IS HEREBY ORDERED that Respondents show cause, if there be any, before this Court at IAS Part 41, in Courtroom 232 at the Courthouse located at 60 Centre Street, New York, New York, on the ___ day of August, 2014 at _____ a.m./p.m., or as soon thereafter as counsel can be heard, why a preliminary injunction should not be entered pursuant to CPLR Section 6301, pending a final determination of this proceeding (a) tolling the running of the period for MASN to cure the alleged default claimed by the Nationals (the "Cure Period") and (b) enjoining Respondents from terminating MASN's license to telecast the Nationals' games pursuant to the Settlement Agreement or taking any other action to deprive MASN of that right; and it is further

ORDERED, that pending a hearing on this motion, the Cure Period is hereby suspended and Respondents, their agents and attorneys, and any other person or entity with notice of this Order, are hereby restrained and enjoined from taking any action to terminate MASN's license to

telecast the Nationals' games pursuant to the Settlement Agreement or taking any other action to deprive MASN of that right; and it is further

ORDERED, that service of a copy of this Order to Show Cause, together with the papers upon which it is based, upon Respondents on or before August ____, 2014 shall be deemed good and sufficient service thereof; and it is further

ORDERED, that opposition papers, if any, shall be served on or before August ____, 2014; and it is further

ORDERED, that reply papers, if any, shall be served on or before _____, 2014.

E N T E R :

J.S.C.