

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA

In re:

PITTSBURGH ATHLETIC ASSOCIATION, *et al.*¹,

Debtors.

Jointly Administered at:
Bankruptcy No. 17-22222-JAD

Bankruptcy Nos:
17-22222-JAD, and
17-22223-JAD

Chapter 11

Hearing Date:
February 6, 2018, at 10:00 a.m.

Response Deadline:
January 29, 2018

**APPLICATION BY DEBTORS PURSUANT TO 11 U.S.C. §§ 327, 328, 330
AND 504, FED.R.BANKR.P. 2014(A) AND 2016, AND LOCAL RULE
2016-1 FOR AUTHORITY TO EMPLOY AND RETAIN VALBRIDGE
PROPERTY ADVISORS, *NUNC PRO TUNC* TO DECEMBER 18, 2017**

The Pittsburgh Athletic Association and the Pittsburgh Athletic Association Land Company (collectively, the “**Debtors**”) file this Application (the “**Application**”) for entry of order (the “**Order**”), substantially in the form attached hereto, authorizing the retention and employment of Valbridge Property Advisors (“**Valbridge**”), *nunc pro tunc* to December 18, 2017.

JURISDICTION

1. This Court has jurisdiction to consider this Application under 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper under 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested herein are sections 327, 328, 330 and 504 of Title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (as amended; hereinafter the “**Bankruptcy Code**”), Rules 2014(a) and 2016 of the Federal Rules of Bankruptcy Procedure (the

¹ The Debtors have the following cases pending Pittsburgh Athletic Association, Bankruptcy No. 17-22222-JAD and the Pittsburgh Athletic Association Land Company, Bankruptcy No. 17-22223-JAD, both cases are being jointly administered under Case No. 17-22222-JAD.

“**Bankruptcy Rules**”), and Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Western District of Pennsylvania (the “**Local Rules**”).

BACKGROUND

3. On May 30, 2017 (the “**Petition Date**”), the Debtors filed voluntary petitions in this Court for relief under chapter 11 of the Bankruptcy Code.

4. The Debtors are authorized to continue to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. No trustee or examiner has been appointed in these chapter 11 cases.

6. On June 8, 2017, the Office of the United States Trustee formed the Official Committee of Unsecured Creditors (the “**Committee**”).

7. Additional information regarding the Debtors’ businesses, the capital structures and the circumstances leading to the commencement of these chapter 11 cases is set forth in the Declaration of James A. Sheehan (Doc. 15), sworn to and filed on the Petition Date.

8. Prior to the Petition Date, the Debtors were approached by Pittsburgh History and Landmarks Foundation (“PHLF”) in connection with the idea of granting PHLF a Historic Preservation Easement for the purpose of “preserving” the architecturally significant aspects of the façade of PAA’s Clubhouse located at 4215 Fifth Avenue, Pittsburgh, Pennsylvania 15213.

9. On April 12, 2017, a Historic Preservation Easement Agreement (the “**Easement**”) was granted by Pittsburgh Athletic Association Land Company (“PAALC”) to PHFL whereby PAALC agreed to *inter alia* maintain the façade in perpetuity.

10. The Easement was recorded against the Debtors’ building located at 4125 Fifth Avenue, Pittsburgh, PA 15213, on April 13, 2017 with the Department of Real Estate at Instrument No. 2017-10369.

11. A primary benefit to the grantor (PAALC) of the Easement is a federal charitable contribution deduction in accordance with Section 170(h) of the Internal Revenue Code (the “Deduction”).

12. The value of the Deduction is equal to the value of the preservation easement as determined by a “qualified appraisal” conducted by a “qualified appraiser”.

13. The Debtors require a qualified appraisal of the Easement to determine the value of the Deduction.

RELIEF REQUESTED

14. By this Application, pursuant to 11 U.S.C. §§ 327, 328, 330 and 504, Fed.R.Bankr.P. 2014(a) and 2016, and Local Rule 2016-1, the Debtors request authority to employ and retain Valbridge to appraise the façade easement in accordance with the terms and conditions set forth in that certain engagement letter (the “**Engagement Letter**”) dated December 18, 2017. A true and correct copy of the engagement letter is attached hereto as **Exhibit “A”**.

15. In support of this Application, the Debtors submit the Declaration of Mark Shonberg, Senior Managing Director, Valbridge (the “**Shonberg Declaration**”), annexed hereto as **Exhibit “B”**, and the Declaration of James A. Sheehan, the President of the Debtors (the “**Sheehan Declaration**”), annexed hereto as **Exhibit “C”**.

16. The Debtors request that the Court approve the retention of Valbridge under a special retainer of \$10,000.00 (the “**Appraisal Fee**”) and under a general retainer as Valbridge may be required to provide services at an hourly rate pursuant to the Engagement Letter. The rates charged by Valbridge are consistent with the rates charged in comparable non-bankruptcy matters and are subject to periodic adjustments to reflect economic and other conditions.

VALBRIDGE’S QUALIFICATIONS

17. The Debtors seek to retain Valbridge as the qualified appraiser because Valbridge is one of the largest commercial property valuation and advisory service firms in the United States, with

approximately 200 MAI-designated appraisers and provides independent appraisal services consistent with the highest industry standards of practice. The Managing Directors of Valbridge's Pittsburgh office are all MAI certified and have substantial experience with commercial valuations. Debtors submit that Valbridge is both well-qualified and uniquely able to provide a valuation of the Easement in an efficient and timely manner. The retention of Valbridge is in the best interest of the Debtors and their estates.

SERVICES TO BE PROVIDED

18. A typical diminution in value from a façade easement ranges from 5 to 20% of the market value of the property, and a qualified appraisal is required to qualify for significant tax credits.

19. The employment of Valbridge is appropriate and necessary as Valbridge will determine the diminution in value associated with the Easement and provide a qualifying appraisal report compliant with U.S. Treasury Regulations. Valbridge will also provide testimony and consulting related to the valuation as necessary.

20. Valbridge understands that the Debtors have retained other professionals and agrees to work cooperatively with such professionals to integrate any respective work conducted by the professionals on behalf of the Debtors. Valbridge has assured the Debtors that it will work closely with its professionals and will avoid duplication of services being provided by other professionals.

21. Except as set forth in the Declarations, to the best of the Debtor's knowledge, Valbridge: (a) does not have any connection with the Debtors, its affiliates, its creditors, the United States Trustee, any person employed in the Office of the United States Trustee, or any other party in interest, or its respective attorneys and accountants; (b) is a "disinterested person," as that term is defined in section 101(14) of the Bankruptcy Code; and (c) does not hold or represent any interest adverse to the Debtors' estates.

22. Valbridge intends to apply to the Court for allowance of hourly compensation in accordance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, orders of this Court, and the Fee Guidelines promulgated by the Executive Office of the United States Trustee (the

“**Fee Guidelines**”). All professionals who will be rendering services on behalf of the Debtors will maintain billing records setting forth complete and detailed activity descriptions, including a time allotment billed in increments of one-tenth of an hour. Each activity will include a description of the type and subject matter of the activity undertaken.

23. The Debtors, subject to the provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, orders of this Court, and the Fee Guidelines, propose to pay Valbridge the Appraisal Fee upon approval of this Court and pay Valbridge’s customary hourly rates in effect from time to time as set forth in this Application. The Debtors respectfully submit that Valbridge’s rates and policies stated in the Declaration are reasonable.

24. No previous request for the relief sought herein has been made to this Court or any other court.

WHEREFORE, the Debtors pray that this Honorable Court enter an order authorizing the employment of Valbridge Property Advisors, upon the terms set forth in this Application and the Engagement Letter and granting such other and further relief as is just and proper.

Respectfully submitted,

TUCKER ARENSBERG, P.C.

DATED: January 12, 2018

/s/ Jordan S. Blask

Jordan S. Blask, Esquire

PA ID No. 308511

Jeremiah J. Vandermark, Esquire

PA ID No. 317230

1500 One PPG Place

Pittsburgh, PA 15222

Phone: 412-566-1212

jblask@tuckerlaw.com

jvandermark@tuckerlaw.com

Counsel for the Debtor

Exhibit “A”

[Engagement Letter]



4701 Baptist Rd.
Pittsburgh, PA 15227
412.881.6080 phone
412.881.8040 fax
valbridge.com

November 27, 2017

Mr. James Sheehan, President
Pittsburgh Athletic Association Land Company
c/o David W. Ross, Esquire
Babst | Calland
Two Gateway Center
Pittsburgh, Pennsylvania 15222

Dear Mr. Sheehan:

Thank you for inquiring about real estate services through Valbridge Property Advisors. The services and terms of engagement are proposed as follows:

Client:	Pittsburgh Athletic Association Land Company and Pittsburgh Athletic Association (collectively PAA)
Property:	Façade Easement - 4215 Fifth Ave, Pittsburgh, PA 15213
Location:	City of Pittsburgh, Allegheny County, Pennsylvania
Assignment Type:	Appraisal – Single valuation date
Appraisal Fee:	\$10,000
Witness Prep:	\$300 per hour
Testimony:	\$300 per hour
Consulting:	\$300 per hour (if applicable)
Retainer:	Waived. PAA agrees that if fees are not paid, Valbridge Property Advisors may seek payment (including reasonable costs) from PAA in U.S. Bankruptcy Court or other Court of competent jurisdiction.
Delivery:	40 days from engagement.
Engagement:	Services are deemed to have been engaged upon written authorization to proceed.
Conditions:	Delivery timing is predicated on a complete response to the data request within five business days. It is acknowledged that retention and payment of fees/expenses are subject to Bankruptcy Court approval.
Final Payment:	Not to exceed 30 days from completion of the specified services or from Bankruptcy Court approval, whichever is later.

Pittsburgh Athletic Association Land Company

November 10, 2017
Page 2

Please return the signed contract to my attention to assure proper processing. Please note that this proposal is valid for seven business days. Should there be no response in that time frame, it will be assumed that our services are not required.

Should you have any questions regarding the fee, time frame or services to be rendered, please call me at (412) 881-6080 ext. 313. Thank you for the opportunity to present this proposal.

Sincerely,


Barbara Buchanan
Appraisal Administrator

cc: Mark Shonberg

For Pittsburgh Athletic Association Land Company:



Authorized Signature

12.18.2017
Date

JAMES A. SHEEHAN, PRES.
Print or Type Name and Title

Client Contact (Phone/email)

For Pittsburgh Athletic Association:



Authorized Signature

12.18.2017
Date

JAMES A. SHEEHAN, PRES.
Print or Type Name and Title

Client Contact (Phone/email)

Exhibit “B”

[Shonberg Declaration]

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA**

In re:

PITTSBURGH ATHLETIC ASSOCIATION, *et al.*¹,

Debtors.

Jointly Administered at:
Bankruptcy No. 17-22222-JAD

Bankruptcy Nos:
17-22222-JAD, and
17-22223-JAD

Chapter 11

**DECLARATION AND DISCLOSURE STATEMENT OF MARK SHONBERG IN
SUPPORT OF APPLICATION BY DEBTORS PURSUANT TO 11 U.S.C. §§ 327,
328, 330 AND 504, FED.R.BANKR.P. 2014(A) AND 2016, AND LOCAL RULE
2016-1 FOR AUTHORITY TO EMPLOY AND RETAIN VALBRIDGE PROPERTY
ADVISORS *NUNC PRO TUNC* TO DECEMBER 18, 2017**

Mark Shonberg this declaration under 28 U.S.C. § 1746:

1. I am a Senior Managing Director of Valbridge Property Advisors | Pittsburgh (“**Valbridge**”) with offices located at 4701 Baptist Road, Pittsburgh, PA 15227.
2. I am authorized to make this Declaration² on behalf of Valbridge.
3. I submit this Declaration in support of the Application for authority to employ and retain Valbridge, *nunc pro tunc* to December 18, 2017, for the appraisal fee of \$10,000.00 and at Valbridge’s normal hourly rates, in effect from time to time, in compliance with sections 329 and 504 of the Bankruptcy Code, and to provide the disclosure required under Rules 2014(a) and 2016(b) of the Bankruptcy Rules.
4. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein. To the extent any information disclosed herein requires amendment or modification upon Valbridge’s completion of further review, or as additional party in interest information becomes available

¹ The Debtors have the following cases pending Pittsburgh Athletic Association, Bankruptcy No. 17-22222-JAD and the Pittsburgh Athletic Association Land Company, Bankruptcy No. 17-22223-JAD, both cases are being jointly administered under Case No. 17-22222-JAD.

² Capitalized terms not defined herein shall have the meanings ascribed to them in the Application by the Debtors Pursuant to 11 U.S.C. §§ 327, 328, 330 and 504, Fed.R.Bankr.P. 2014(a) and 2016, and Local Rule 2016-1 for Authority to Employ and Retain Valbridge Property Advisors *Nunc Pro Tunc* to December 18, 2017.

to it, a supplemental declaration will be submitted to the Court reflecting such amended or modified information.

5. The Debtors employed Valbridge to appraise the diminution value of the Easement and to provide additional, related services as appropriate. The MAI certified appraisers with Valbridge's Pittsburgh office have experience with commercial valuations and façade easements and is qualified to represent the Debtors regarding this matter.

DISINTERESTEDNESS OF PROFESSIONALS

6. Based on the conflict searches conducted to date and described herein, to the best of my knowledge, neither I, Valbridge's Pittsburgh office, nor any managing director or appraiser thereof, insofar as I have been able to ascertain, has any connection with the Debtors, their creditors or any parties-in-interest, their attorneys or accountants, the United States Trustee or any person employed in the Office of the United States Trustee, except as disclosed or otherwise described herein. To the extent a conflict was discovered, the appropriate waivers have been obtained by the parties. Further information regarding the conflict searches conducted and waivers of conflict is set forth in the **"Schedule of Conflicts"** attached hereto as **Schedule "A"**. Accordingly, neither I nor any managing director or appraiser of Valbridge's Pittsburgh office holds any interest adverse to the Debtors or the Debtors' estates, and I and each managing director and appraiser of Valbridge's Pittsburgh office is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code.

7. None of the connections described in Schedule "A" is materially adverse to the interests of the Debtors' estates.

PROFESSIONAL COMPENSATION

8. The Debtors will pay an appraisal fee of \$10,000.00 (the “Appraisal Fee”) to Valbridge.

9. Subject to Court approval under section 330(a) of the Bankruptcy Code, further compensation will be payable to Valbridge on an hourly basis pursuant to the Engagement Letter. The hourly rates charged by Valbridge are consistent with the rates charged in comparable non-bankruptcy matters and are subject to periodic adjustments to reflect economic and other conditions.

10. Valbridge’s hourly rates are set at a level designed to fairly compensate Valbridge for the work of its appraisers and other employees. The Application requests approval of Valbridge’s retention on rates, terms, and conditions consistent with what Valbridge charges non-chapter 11 debtors, namely, prompt payment of the Appraisal Fee and Valbridge’s hourly rates as adjusted from time. All employees who will be rendering hourly billed services on behalf of the Debtors will maintain billing records setting forth complete and detailed activity descriptions, including a time allotment billed in increments of one-tenth of an hour. Each activity will include a description of the type and subject matter of the activity undertaken.

11. No promises have been received by Valbridge or by any director or employee thereof as to compensation in connection with these cases other than in accordance with the provisions of the Bankruptcy Code. I have not agreed to share with any persons (except the employees/shareholders of Valbridge as applicable) the compensation for the services rendered in this case.

12. Valbridge understands that the Debtors have retained other professionals and agrees to work cooperatively with such professionals to integrate any respective work conducted by the professionals on behalf of the Debtors. Valbridge has assured the Debtors that it will work closely with its professionals and will avoid duplication of services being provided by other professionals.

Pursuant to 28 U.S.C. § 1746, I verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Declaration of Mark Shonberg

Dated: January 12, 2018

By:


Mark Shonberg
Senior Managing Director
Valbridge Property Advisors

Schedule “A”

[Schedule of Conflicts]

None noted at this time but will be revised or supplemented by Valbridge Property Advisors in the event any conflicts arise or are discovered in the future.

Exhibit “C”

[Sheehan Declaration]

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA**

In re:

PITTSBURGH ATHLETIC ASSOCIATION, *et al.*¹,

Debtors.

Jointly Administered at:
Bankruptcy No. 17-22222-JAD

Bankruptcy Nos:
17-22222-JAD, and
17-22223-JAD

Chapter 11

**DECLARATION OF JAMES A. SHEEHAN IN SUPPORT OF APPLICATION OF
DEBTORS PURSUANT TO 11 U.S.C. §§ 327, 328, 330 AND 504, FED.R.BANKR.P. 2014(A)
AND 2016, AND LOCAL RULE 2016-1 FOR AUTHORITY TO EMPLOY AND RETAIN
VALBRIDGE PROPERTY ADVISORS *NUNC PRO TUNC* TO DECEMBER 18, 2017**

I, JAMES A. SHEEHAN, make this Declaration² under 28 U.S.C. § 1746:

1. I am the President of the Board of Directors of the Debtors. In my current role with the Debtors, I am responsible for, among other things, supervising outside counsel and monitoring and managing legal fees and expenses.

2. On May 30, 2017, the Debtors commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code.

3. This Declaration is provided in support of the Application to employ and retain Valbridge Property Advisors, *nunc pro tunc*, to December 18, 2017. Except as otherwise indicated herein, the facts set forth in this Declaration are based upon my personal knowledge, information provided to me by the Debtors' employees or advisors, or my opinion based upon knowledge and experience as President of the Debtors. I am authorized to submit this Declaration on behalf of the Debtors.

¹ The Debtors have the following cases pending Pittsburgh Athletic Association, Bankruptcy No. 17-22222-JAD and the Pittsburgh Athletic Association Land Company, Bankruptcy No. 17-22223-JAD, both cases are being jointly administered under Case No. 17-22222-JAD.

² Capitalized terms not defined herein shall have the meanings ascribed to them in the Application by the Debtors Pursuant to 11 U.S.C. §§ 327, 328, 330 and 504, Fed.R.Bankr.P. 2014(a) and 2016, and Local Rule 2016-1 for Authority to Employ and Retain Valbridge Property Advisors *Nunc Pro Tunc* to December 18, 2017.

4. The Debtors recognize that a comprehensive review process is necessary when selecting and managing commercial appraisers to ensure their bankruptcy professionals are subject to the same client-driven market forces, security, and accountability as professionals in non-bankruptcy engagements. The Debtors chose Valbridge based upon Valbridge's reputation and experience with commercial façade easement appraisals, the Debtors' particular circumstances, and discussions with their counsel.

5. I am aware that Valbridge is the proposed appraiser for the Debtors. I further certify that to the best of my knowledge, no actual or potential conflict exists which would render Valbridge not disinterested.

6. As President, I have carefully reviewed and am familiar with the terms of Valbridge's engagement on behalf of the Debtors. Valbridge has confirmed to me that it does not vary its billing rates or the material terms of an engagement depending on whether such engagement is a bankruptcy or a non-bankruptcy engagement. Valbridge has advised me of its appraisal fee of \$10,000.00 and that its current customary U.S. rates are \$300.00 per hour for testimony, witness preparation and consulting. It is my understanding that Valbridge reviews and adjusts its billing rates annually. Valbridge has advised me that it will inform the Debtors of any adjustment to its existing rate structure.

7. I am informed by Valbridge that its billing rates are aligned each year to ensure that its rates are comparable to the billing rates of its peer firms. However, to the extent there is any disparity in such rates, I nevertheless believe that Valbridge's retention by the Debtors is warranted in this case for the reasons set forth in the Application.

8. I understand that Valbridge's hourly fees will be subject to periodic review on a monthly, interim, and final basis during the pendency of these chapter 11 cases by, among other parties, the Office of the United States Trustee, the Debtors, and any official committees appointed in these chapter 11 cases in accordance with the terms of the Bankruptcy Code, the Bankruptcy Rules, the Local

Rules, and any orders of the Court governing the procedures for approval of interim compensation of professionals retained in these chapter 11 cases.

9. As President, I manage fees and expenses incurred by the Debtors' professionals. I personally review the professional's invoices and authorize all fees and expenses prior to the payment of such fees. The Debtors will regularly monitor the fees of Valbridge to ensure that Valbridge's professionals are assisting the Debtors in the most cost-effective and efficient manner. In doing so, I assure that all requested fees are not unreasonable and correspond with necessary or beneficial services rendered on behalf of the Debtors and their estates. The aforementioned review and approval process does not differ when the Debtors employ professionals for non-bankruptcy cases. Moreover, Valbridge has informed me that the Debtors will be provided with the opportunity to review all invoices and request adjustments to such invoices to the extent that the Debtors determine that such adjustments are necessary and appropriate, which requests will be carefully considered by Valbridge. The Debtors will employ procedures for reviewing professional invoices similar to those that they have employed prior to the commencement of these chapter 11 cases.

I declare under penalty of perjury that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Declaration of James A. Sheehan

DATED: January 12, 2018

By: /s/ James A. Sheehan
Name: JAMES A. SHEEHAN
Title: President
Pittsburgh Athletic Association

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA**

In re:

PITTSBURGH ATHLETIC ASSOCIATION,
*et al.*¹,

Debtors.

Jointly Administered at:
Bankruptcy No. 17-22222-JAD

Bankruptcy Nos:
17-22222-JAD, and
17-22223-JAD

Chapter 11

Hearing Date:
February 6, 2018, at 10:00 a.m.

Response Deadline:
January 29, 2018

ORDER AUTHORIZING EMPLOYMENT OF VALBRIDGE PROPERTY ADVISORS

AND NOW, this ____ day of _____, 2018, upon consideration of the Application by Debtors Pursuant to 11 U.S.C. §§ 327, 328, 330 and 504, Fed.R.Bankr.P. 2014(A) and 2016, and Local Rule 2016-1 for Authority to Employ and Retain Valbridge Property Advisors *Nunc Pro Tunc* to December 18, 2017, it is **ORDERED, ADJUDGED** and **DECREED** as follows:

1. The above referenced Application is hereby approved *nunc pro tunc* as of December 18, 2017.
2. Debtors are authorized to employ and retain Valbridge Property Advisors, located at 4701 Babptist Road, Pittsburgh, PA 15227, pursuant to the Engagement Letter, *nunc pro tunc* to December 18, 2017.

¹ The Debtors have the following cases pending Pittsburgh Athletic Association, Bankruptcy No. 17-22222-JAD and the Pittsburgh Athletic Association Land Company, Bankruptcy No. 17-22223-JAD, both cases are being jointly administered under Case No. 17-22222-JAD.

3. The appraisal fee of \$10,000.00 is allowed and the Debtors are authorized to pay the appraisal fee to Valbridge Property Advisors.

4. Professional persons or entities performing services in the above cases are advised that the approval of fees for professional services will be based not only on the amount involved and the results accomplished, but other factors as well, including: the tasks and labor reasonably required by counsel, the novelty and difficulty of the issues presented, the skill requisite to perform the legal service properly, the preclusion of other employment due to acceptance of this case, the customary fee, whether the fee is fixed or contingent, the time limitations imposed by the client or the circumstances, the experience, reputation and ability of the attorneys involved, the undesirability of the case, the nature and length of the professional relationship with the client, and, awards in similar cases.

5. Approval of any application of employment of professionals in which certain hourly rates/compensation terms are stated for various professionals is not an agreement by the Court to allow fees at the hourly rates or compensation terms. Final compensation, awarded only after notice and hearing, may be more or less than the requested hourly rates/compensation terms based on application of the above-mentioned factors in granting approval by Court Order.

JEFFERY A. DELLER
United States Bankruptcy Judge

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA**

In re:

PITTSBURGH ATHLETIC ASSOCIATION, *et al.*¹,

Debtors.

Jointly Administered at:
Bankruptcy No. 17-22222-JAD

Bankruptcy Nos:
17-22222-JAD, and
17-22223-JAD

Chapter 11

**CERTIFICATE OF SERVICE OF NOTICE OF HEARING AND APPLICATION BY
DEBTORS PURSUANT TO 11 U.S.C. §§ 327, 328, 300 AND 504, FED.R.BANKR.P. 2014(A)
AND 2016, AND LOCAL RULE 2016-1 FOR AUTHORITY TO EMPLOY AND RETAIN
VALBRIDGE PROPERTY ADVISORS *NUNC PRO TUNC* TO DECEMBER 18, 2017**

I hereby certify that on January 12, 2018, I served the above-captioned pleading on the parties at the following email addresses. The type of service made on these parties was electronic mail.

Claudia Davidson, Esquire
claudia.davidson@pghlaborlawyers.com

Office of the United States Trustee
norma.l.hildenbrand@usdoj.gov

John M. Steiner, Esquire
jsteiner@leechtishman.com

David W. Lampl, Esquire
bankruptcy@leechtishman.com

I further certify that the above captioned pleading was filed on January 12, 2018, with the Clerk of the United States Bankruptcy Court for the Western District of Pennsylvania using its CM/ECF system, automatically serving the above-captioned pleadings on the all parties electing to receive electronic notification in the above captioned matter, including the parties at the addresses specified in the email list attached hereto as Service List “1”. The type of service made on these parties was electronic notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example: the names and addresses of parties served by electronic notice will be listed under the heading “Service by Electronic Notification” and those served by mail will be listed under the heading “Service by First Class Mail.”

¹ The Debtors have the following cases pending Pittsburgh Athletic Association, Bankruptcy No. 17-22222-JAD and the Pittsburgh Athletic Association Land Company, Bankruptcy No. 17-22223-JAD, both cases are being jointly administered under Case No. 17-22222-JAD.

DATED: January 12, 2018

/s/ Jordan S. Blask

Jordan S. Blask, Esquire

PA ID No. 308511

Jeremiah J. Vandermark, Esquire

PA ID No. 317230

1500 One PPG Place

Pittsburgh, PA 15222

Phone: 412-566-1212

jblask@tuckerlaw.com

jvandermark@tuckerlaw.com

Counsel for the Debtor

Service List “1”

[Service by Electronic Notification]

Justin T. Barron on behalf of Defendant Oakland Fifth Avenue Hotel Associates, LP
jbarron@metzlewis.com, ccameron@metzlewis.com

Jordan S. Blask on behalf of Debtor Pittsburgh Athletic Association
jblask@tuckerlaw.com, agilbert@tuckerlaw.com

Jordan S. Blask on behalf of Debtor Pittsburgh Athletic Association Land Company
jblask@tuckerlaw.com, agilbert@tuckerlaw.com

Jordan S. Blask on behalf of Plaintiff Pittsburgh Athletic Association
jblask@tuckerlaw.com, agilbert@tuckerlaw.com

Jordan S. Blask on behalf of Plaintiff Pittsburgh Athletic Association Land Company
jblask@tuckerlaw.com, agilbert@tuckerlaw.com

Matthew James Burne on behalf of Debtor Pittsburgh Athletic Association
mburne@tuckerlaw.com

Matthew James Burne on behalf of Debtor Pittsburgh Athletic Association Land Company
mburne@tuckerlaw.com

Matthew James Burne on behalf of Plaintiff Pittsburgh Athletic Association
mburne@tuckerlaw.com

Matthew James Burne on behalf of Plaintiff Pittsburgh Athletic Association Land Company
mburne@tuckerlaw.com

CSU - OUCTS, PA Labor & Industry
ra-li-uets-bankpitts@state.pa.us

Claudia Davidson on behalf of Creditor National Retirement Fund
claudia.davidson@pghlaborlawyers.com, dsapp@amalgamatedlife.com

Claudia Davidson on behalf of Creditor Committee Official Committee Of Unsecured Creditors
claudia.davidson@pghlaborlawyers.com, dsapp@amalgamatedlife.com

Matthew A. Gold on behalf of Creditor Argo Partners
courts@argopartners.net

Jeffrey R. Hunt on behalf of Creditor Allegheny County Central Tax Collection District
jhunt@grblaw.com, cnoroski@grblaw.com

Jeffrey R. Hunt on behalf of Creditor City & School District of Pittsburgh
jhunt@grblaw.com, cnoroski@grblaw.com

Jeffrey R. Hunt on behalf of Creditor County of Allegheny

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Jeffrey R. Hunt on behalf of Creditor Pittsburgh Water & Sewer Authority

jhunt@grblaw.com, cnoroski@grblaw.com

Jennifer M. Irvin on behalf of Creditor CSU - OUCTS, PA Labor & Industry

jeirvin@pa.gov, jeirvin@pa.gov

Michael J. Joyce on behalf of Interested Party JDI Loans L.L.C./Rollover Fund LLC

mjoyce@saull.com

Michael J. Joyce on behalf of Interested Party PITT AA LLC

mjoyce@saull.com

David W. Lampl on behalf of Creditor Committee Official Committee Of Unsecured Creditors

bankruptcy@leechtishman.com, dlampl@leechtishman.com; cthorton-illar@leechtishman.com; mproden@leechtishman.com

Robert O Lampl on behalf of Interested Party Pittsburgh Athletic Association Preservation Association (PAAPA)

rol@lampllaw.com,

jschemm@lampllaw.com; jlacher@lampllaw.com; dfuchs@lampllaw.com; eslagle@lampllaw.com; neish51@gmail.com; jcooney@lampllaw.com; rcooney@lampllaw.com; slampl@lampllaw.com; RossLampl@lampllaw.com

Robert O Lampl on behalf of Interested Party Yvonne L. Rose

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Jessica Heveran Lathrop on behalf of Interested Party Pennsylvania Liquor Control Board

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Andrew Joseph Leger, Jr on behalf of Creditor Mary A Barone

aleger@leger-law.com

Thomas J. Michael on behalf of Interested Party Yvonne L. Rose

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