

Attachment B

Exhibit 1.1.142

Non-Exclusive List of LBO Related Causes of Action and Defendants

NOTEHOLDER PLAN EXHIBIT 1.1.142

NON-EXCLUSIVE LIST OF LBO-RELATED CAUSES OF ACTION AND DEFENDANTS

This Exhibit is subject to all of the provisions of the Noteholder Plan, including, without limitation, Section 13.8, pursuant to which the Proponents have reserved the right, subject to section 1127 of the Bankruptcy Code and, to the extent applicable, sections 1122, 1123 and 1125 of the Bankruptcy Code, to alter, amend or modify the Noteholder Plan or the Exhibits at any time prior to or after the Confirmation Date but prior to substantial consummation of the Noteholder Plan.

NON-EXCLUSIVE LIST OF LBO-RELATED CAUSES OF ACTION AND DEFENDANTS

The Proponents of the Noteholder Plan have identified below a non-exclusive list of the LBO-Related Causes of Action.¹ For the avoidance of doubt, the LBO-Related Causes of Action include all claims and causes of action asserted in the Creditors' Committee Director, Officer and Shareholder Complaint and the Creditors' Committee LBO Lender Complaint (as such may be amended) filed by the Creditors' Committee pursuant to the Standing Order (other than Abandoned Claims and State Law Avoidance Claims).

Failure to include a LBO-Related Cause of Action on the attached schedules (the "Schedules") shall not constitute a release of such cause of action and shall not indicate that such cause of action has not been retained. Moreover, failure to attribute any specific cause of action to a particular Person on the attached Schedules shall not mean that such cause of action is not retained against such Person. All possible LBO-Related Causes of Action not listed on the attached Schedules are retained unless such action is an Abandoned Claim, State Law Avoidance Claim or otherwise released pursuant to the Noteholder Plan, the Confirmation Order or other Final Order.

¹ Capitalized terms used but not defined herein shall bear the meanings ascribed to them in the Noteholder Plan unless otherwise designated.

I. LBO-Related Causes of Action Listed in the Creditors’ Committee Director, Officer and Shareholder Complaint²

Cause of Action	Defendant(s)	Relief Sought
Breach of Fiduciary Duty	<u>Parent Officer Defendants:</u> Bigelow, Grenesko, Hianik, Kazan, Kenney, Leach, Lewin, Mallory, Musil, FitzSimons <u>Parent Director Defendants:</u> FitzSimons, Hernandez, Holden, Morrison, Osborn, Reyes, Taft, White, Chandler, Goodan, Stinehart	Joint/several judgment in amount TBD
Breach of Fiduciary Duty	Zell	Joint/several judgment in amount TBD
Breach of Fiduciary Duty	<u>Subsidiary D&O Defendants:</u> Amsden, Carver, Finke, Gremillion, Hiller, Knight, Landon, Malone, Monsma, Quimby, Reardon, Smith, Vitanovec, Waltz, Williams, Worthington, FitzSimons, Bigelow, Hianik, Kenney	Joint/several judgment in amount TBD
Aiding & Abetting Breach of Fiduciary Duty	<u>Subsidiary D&O Defendants:</u> Amsden, Carver, Finke, Gremillion, Hiller, Knight, Landon, Malone, Monsma, Quimby, Reardon, Smith, Vitanovec, Waltz, Williams, Worthington, FitzSimons, Bigelow, Hianik, Kenney	Joint/several judgment in amount TBD
Breach of Fiduciary Duty	<u>Large Shareholders:</u> Chandler Trust No. 1, Chandler Trust No. 2, McCormick Foundation, Cantigny Foundation	Joint/several judgment in amount TBD
Aiding & Abetting Breach of Fiduciary Duty	<u>Chandler Trust Representatives:</u> Chandler, Goodan, Stinehart	Joint/several judgment in amount TBD
Aiding & Abetting Breach of Fiduciary Duty	<u>Large Shareholders:</u> Chandler Trust No. 1, Chandler Trust No. 2, McCormick Foundation, Cantigny Foundation	Joint/several judgment in amount TBD
Aiding & Abetting Breach of Fiduciary Duty	<u>Zell Defendants:</u> Zell, EGI, ³ EGI-TRB, ⁴ Sam Investment Trust	Joint/several judgment in amount TBD

² Capitalized terms used but not defined in this Section I shall bear the meanings ascribed to them in the Creditors’ Committee First Amended Third Party Complaint, filed with the Court on December 7, 2010 (Adv. Proc. No. 10-54010 (KJC)).

³ Equity Group Investments, L.L.C. (“EGI”).

⁴ EGI-TRB, L.L.C. (“EGI-TRB”).

Cause of Action	Defendant(s)	Relief Sought
Aiding & Abetting Breach of Fiduciary Duty	VRC ⁵	Judgment in amount TBD
Professional Malpractice	VRC	Judgment in amount TBD
Aiding & Abetting Breach of Fiduciary Duty	GreatBanc ⁶ Duff & Phelps, LLC	Judgment in amount TBD
Violations of Delaware General Corporation Law (Improper Purchase/Redemption and/or Improper Dividends) (DGCL §§ 160 and/or 173)	<u>Parent Director Defendants:</u> FitzSimons, Hernandez, Holden, Morrison, Osborn, Reyes, Taft, White, Chandler, Goodan, Stinehart Zell	Judgment in amount TBD
Unjust Enrichment	<u>Parent Officer Defendants:</u> Bigelow, Grenesko, Hianik, Kazan, Kenney, Leach, Lewin, Mallory, Musil, FitzSimons <u>Parent Director Defendants:</u> FitzSimons, Hernandez, Holden, Morrison, Osborn, Reyes, Taft, White, Chandler, Goodan, Stinehart <u>Subsidiary D&O Defendants:</u> Amsden, Carver, Finke, Gremillion, Hiller, Knight, Landon, Malone, Monsma, Quimby, Reardon, Smith, Vitanovec, Waltz, Williams, Worthington, FitzSimons, Bigelow, Hianik, Kenney <u>Large Shareholders:</u> Chandler Trust No. 1, Chandler Trust No. 2, McCormick Foundation, Cantigny Foundation	Disgorgement of all payments, profits, fees, benefits, incentives and other compensation received in connection with the LBO Transaction

⁵ Valuation Research Corporation (“VRC”).

⁶ GreatBanc Trust Company (“GreatBanc”).

Cause of Action	Defendant(s)	Relief Sought
Unjust Enrichment	<p><u>Zell Defendants</u>: Zell, EGI, EGI-TRB, Sam Investment Trust</p> <p><u>Tower Defendants</u>: Tower CH, L.L.C., Tower DC, L.L.C., Tower DL, L.L.C., Tower EH, L.L.C., Tower Greenspun DGSPT, LLC, Tower Greenspun JGGSTP, LLC, Tower Greenspun SGFFT, LLC, Tower Greenspun, L.L.C., Tower HZ, L.L.C., Tower JB, L.L.C., Tower JK, L.L.C., Tower JP, L.L.C., Tower JS, L.L.C., Tower KS, L.L.C., Tower LL, L.L.C., Tower LM, L.L.C., Tower LZ, L.L.C., Tower MH, L.L.C., Tower MS, L.L.C., Tower MZ, L.L.C., Tower NL, L.L.C., Tower PH, L.L.C., Tower PT, L.L.C., Tower SF, L.L.C., Tower TT, L.L.C., Tower VC, L.L.C., and Tower WP, L.L.C.</p> <p>VRC</p> <p>GreatBanc</p> <p>Duff & Phelps, LLC</p>	Disgorgement of all payments, profits, fees, benefits, incentives and other compensation received in connection with the LBO Transaction
<p>Intentional Fraudulent Transfer</p> <p>(11 U.S.C. §§ 544(b), 548(a)(1)(A) & 550(a))</p>	<p><u>Parent Officer Defendants</u>: Bigelow, Grenesko, Hianik, Kazan, Kenney, Leach, Lewin, Mallory, Musil, FitzSimons</p> <p><u>Parent Director Defendants</u>: FitzSimons, Hernandez, Holden, Morrison, Osborn, Reyes, Taft, White, Chandler, Goodan, Stinehart</p> <p><u>Subsidiary D&O Defendants</u>: Amsden, Carver, Finke, Gremillion, Hiller, Knight, Landon, Malone, Monsma, Quimby, Reardon, Smith, Vitanovec, Waltz, Williams, Worthington, FitzSimons, Bigelow, Hianik, Kenney</p> <p><u>Large Shareholders</u>: Chandler Trust No. 1, Chandler Trust No. 2, McCormick Foundation, Cantigny Foundation</p> <p><u>Shareholder Defendants</u>: The DFA Investment Trust Company, DFA Investment Dimensions Group, Inc., The AllianceBernstein Portfolios, Frank W. Denius, Donald M. Hinman Jr., Lewis Taman, William F. Warchol</p> <p>Shareholder Class⁷</p>	<p>Avoidance of Shareholder Transfers</p> <p>Recovery of Shareholder Transfers</p>

⁷ The Shareholder Class is the class of defendants comprised of all persons or legal entities who were the beneficial or legal owners of at least 34.5588 shares of Tribune stock that were purchased, repurchased, or redeemed by Tribune in connection with the LBO Transaction.

Cause of Action	Defendant(s)	Relief Sought
Intentional Fraudulent Transfer (11 U.S.C. §§ 544(b), 548(a)(1)(A) & 550(a))	Zell EGI-TRB	Avoidance of Shareholder Transfers Recovery of Shareholder Transfers
Constructive and/or Intentional Fraudulent Transfer (11 U.S.C. §§ 544(b), 548(a)(1)(A) & 550(a))	<u>Parent Officer Defendants:</u> Bigelow, Grenesko, Hianik, Kazan, Kenney, Leach, Lewin, Mallory, Musil, FitzSimons <u>Parent Director Defendants:</u> FitzSimons, Hernandez, Holden, Morrison, Osborn, Reyes, Taft, White, Chandler, Goodan, Stinehart <u>Subsidiary D&O Defendants:</u> Amsden, Carver, Finke, Gremillion, Hiller, Knight, Landon, Malone, Monsma, Quimby, Reardon, Smith, Vitanovec, Waltz, Williams, Worthington, FitzSimons, Bigelow, Hianik, Kenney	Avoidance of D&O Transfers Recovery of D&O Transfers
Preference (11 U.S.C. §§ 547(b), 550(a))	Bigelow (not less than \$1,645,445.35) FitzSimons (not less than \$28,729,797.55) Grenesko (not less than \$13,841,931.09) Hianik (not less than \$809,019.04) Kazan (not less than \$1,529,253.36) Kenney (not less than \$3,129,788.67) Leach (not less than \$8,065,485.49) Lewin (not less than \$4,767,444.40) Mallory (not less than \$2,132,450.78) [all of whom are Parent Officer Defendants].	Avoidance of Count XV Transfers Recovery of Count XV Transfers
Constructive and/or Intentional Fraudulent Transfer (11 U.S.C. §§ 544(b), 548(a)(1)(A) & 550(a))	VRC	Avoidance of VRC Transfers Recovery of VRC Transfers
Recharacterization of the Exchangeable Note as Equity (11 U.S.C. § 105)	EGI-TRB	Recharacterization of the Exchangeable Note as equity

Cause of Action	Defendant(s)	Relief Sought
Constructive and/or Intentional Fraudulent Transfer (11 U.S.C. §§ 544(b), 548(a)(1)(A) & 550(a))	EGI-TRB Zell	Avoidance of EGI-TRB Transfers Recovery of EGI-TRB Transfers
Preference (11 U.S.C. §§ 547(b), 550(a))	EGI-TRB Zell	Avoidance of Exchangeable Note Transfer and EGI-TRB Fee Payments Recovery of Exchangeable Note Transfer and EGI-TRB Fee Payments
Preference (11 U.S.C. §§ 547(b), 550(a))	EGI	Avoidance of the EGI Reimbursements Recovery of the EGI Reimbursements
Mandatory Subordination of Certain D&O Creditor Claims & Subsidiary Creditor Claims (11 U.S.C. § 510(b))	To the extent such parties have filed claims or have claims that are listed in the Debtors' schedules: <u>Parent Officer Defendants:</u> Bigelow, Grenesko, Hianik, Kazan, Kenney, Leach, Lewin, Mallory, Musil, FitzSimons <u>Parent Director Defendants:</u> FitzSimons, Hernandez, Holden, Morrison, Osborn, Reyes, Taft, White, Chandler, Goodan, Stinehart <u>Subsidiary D&O Defendants:</u> Amsden, Carver, Finke, Gremillion, Hiller, Knight, Landon, Malone, Monsma, Quimby, Reardon, Smith, Vitanovec, Waltz, Williams, Worthington, FitzSimons, Bigelow, Hianik, Kenney	Subordination of all D&O Creditor Claims against Parent Subordination of all D&O Creditor Claims against Subsidiaries

Cause of Action	Defendant(s)	Relief Sought
<p>Equitable Subordination & Disallowance</p> <p>(11 U.S.C. § 510(c))</p>	<p>To the extent such parties have filed claims or have claims that are listed in the Debtors' schedules:</p> <p><u>Parent Officer Defendants:</u> Bigelow, Grenesko, Hianik, Kazan, Kenney, Leach, Lewin, Mallory, Musil, FitzSimons</p> <p><u>Parent Director Defendants:</u> FitzSimons, Hernandez, Holden, Morrison, Osborn, Reyes, Taft, White, Chandler, Goodan, Stinehart</p> <p><u>Subsidiary D&O Defendants:</u> Amsden, Carver, Finke, Gremillion, Hiller, Knight, Landon, Malone, Monsma, Quimby, Reardon, Smith, Vitanovec, Waltz, Williams, Worthington, FitzSimons, Bigelow, Hianik, Kenney</p> <p><u>Zell Defendants:</u> Zell, EGI, EGI-TRB, Sam Investment Trust</p> <p><u>Tower Defendants:</u> Tower CH, Tower DC, Tower DL, Tower EH, Tower Greenspun DGSPT, Tower Greenspun JGGSTP, Tower Greenspun SGFFT, Tower Greenspun, Tower HZ, Tower JB, Tower JK, Tower JP, Tower JS, Tower KS, Tower LL, Tower LM, Tower LZ, Tower MH, Tower MS, Tower MZ, Tower NL, Tower PH, Tower PT, Tower SF, Tower TT, Tower VC, and Tower WP</p>	<p>Subordination of all D&O Claims against Parent</p> <p>Subordination of all D&O Claims against Subsidiaries</p> <p>Subordination of all Zell Creditor Claims</p> <p>Subordination of all EGI-TRB Creditor Claims</p> <p>Subordination of all Tower Creditor Claims</p> <p>Disallowance of all D&O Creditor Claims</p> <p>Disallowance of all Subsidiary Creditor Claims</p> <p>Disallowance of all Zell Creditor Claims</p> <p>Disallowance of all EGI-TRB Creditor Claims</p> <p>Disallowance of all Tower Creditor Claims</p>
<p>Constructive Fraud</p> <p>(11 U.S.C. §§ 544(b), 548(a)(1)(B) & 550(a))</p>	<p>Morgan Stanley⁸</p>	<p>Avoidance of all Morgan Stanley Advisor Fees</p> <p>Recovery of all Morgan Stanley Fees</p>
<p>Professional Malpractice</p>	<p>Morgan Stanley</p>	<p>Judgment in amount TBD</p>
<p>Aiding & Abetting Breach of Fiduciary Duty</p>	<p>Morgan Stanley</p>	<p>Judgment in amount TBD</p>
<p>Insider Trading</p> <p>(15 U.S.C. § 78j(b) & 17 C.F.R. § 240.10b-5)</p>	<p>Morgan Stanley</p>	<p>Judgment in amount TBD</p>
<p>Breach of Duty of Loyalty</p>	<p>Morgan Stanley</p>	<p>Judgment in amount TBD</p>

⁸ Morgan Stanley & Co. Inc. (“Morgan Stanley”).

Cause of Action	Defendant(s)	Relief Sought
Aiding & Abetting Breach of Duty of Loyalty	MSCS ⁹	Judgment in amount TBD
Willful Violation of Automatic Stay (11 U.S.C. § 362(a)(7))	MSCS	Judgment in amount TBD Punitive damages Costs and Attorneys Fees
Equitable Subordination (11 U.S.C. § 510(c))	MSCS	Subordination of MSCS Claim
Turnover	MSCS	Payment of MSCS Debt under Swap Agreement
Preference (11 U.S.C. §§ 547(b), 550(a))	Knight	Avoidance of Tribune Media Net Transfers Avoidance of Affiliate Transfers Recovery of Tribune Media Net Transfers Recovery of Affiliate Transfers
Preference (11 U.S.C. §§ 547(b), 550(a))	Certain of the Subsidiary D&O Defendants: Amsden (not less than \$867,323.57) Carver (not less than \$512,710.44) Gremillion (not less than \$1,735,638.63) Hiller (not less than \$15,394,481.91) Quimby (not less than \$74,668.37) Reardon (not less than \$10,163,663.98) Smith (not less than \$12,408,842.20) Vitanovec (not less than \$7,513,207.72) Waltz (not less than \$3,728,978.35) Williams (not less than \$1,933,946.43) Worthington (not less than \$42,693.00)	Avoidance of Count XXXIII Transfers Recovery of Count XXXIII Transfers

⁹ Morgan Stanley Capital Services Inc. (“MSCS”).

Cause of Action	Defendant(s)	Relief Sought
Preference (11 U.S.C. §§ 547(b), 550(a))	Finke (not less than \$377,461.95) Landon (not less than \$6,979,986.43) Malone (not less than \$1,787,690.66) [all of whom are subsidiary directors]	Avoidance of Count XXXIV Transfers Recovery of Count XXXIV Transfers
Fraudulent Transfer	Knight Certain of the Subsidiary D&O Defendants: Amsden, Carver, Gremillion, Hiller, Quimby, Reardon, Smith, Vitanovec, Waltz, Williams, Worthington, Finke, Landon, and Malone	Avoidance of Potentially Fraudulent Transfers
Preference and Fraudulent Transfers	Knight Certain of the Parent Officer Defendants: Bigelow, FitzSimons, Grenesco, Hianik, Kazan, Kenney, Leach, Lewin, and Mallory Certain of the Subsidiary D&O Defendants: Amsden, Carver, Gremillion, Hiller, Quimby, Reardon, Smith, Vitanovec, Waltz, Williams, Worthington, Finke, Landon, and Malone	Recovery of Count XV Transfers, Count XXXII Transfers, Count XXXIII Transfers, Count XXXIV Transfers and the Potentially Fraudulent Transfers, plus interest

II. Causes of Action Listed in the Creditors' Committee LBO Lender Complaint¹⁰

Cause of Action	Defendant(s)	Relief Sought
<p>Constructive Fraud (i) to avoid (a) LBO Obligations, (b) Equity Value Transfers, and (c) LBO Repayments, and (ii) to recover (y) Equity Value Transfers and (z) LBO Repayments</p> <p>(11 U.S.C. §§ 544(b), 548(a)(1)(B), 550(a), & 551)</p>	<p>JPMCB¹¹ (individually and as Senior Loan Agent)</p> <p>MLCC¹² (individually and as former Bridge Loan Agent)</p>	<p>Avoidance of LBO Obligations, Equity Value Transfers & LBO Repayments</p> <p>Subordination of Bank Claims & Guarantee Claims</p> <p>Disallowance of Bank Claims & Guarantee Claims</p> <p>Recovery of LBO Repayments & Equity Value Transfers plus interest, attorney's fees and costs of suit and collection</p> <p>Preservation of Equity Value Transfers for benefit of Company's estate</p> <p>Prevention from sharing in benefits, proceeds, and/or value recovered and preserved by foregoing actions</p>

¹⁰ Capitalized terms used but not defined in this Section II shall bear the meanings ascribed to them in the Creditors' Committee First Amended LBO Lender Complaint, filed with the Court on December 7, 2010 (Adv. Proc. No. 10-53963 (KJC)).

¹¹ JPMorgan Chase Bank, N.A. ("JPMCB").

¹² Merrill Lynch Capital Corporation ("MLCC").

Cause of Action	Defendant(s)	Relief Sought
<p>Constructive Fraud (i) to avoid (a) LBO Obligations, (b) Equity Value Transfers, and (c) LBO Repayments, and (ii) to recover (y) Equity Value Transfers, and (z) LBO Repayments</p> <p>(11 U.S.C. §§ 544(b), 548(a)(1)(B), 550(a), & 551)</p>	<p><u>Senior Lender Defendants</u>: Oaktree Capital Management, L.P., OCM Opportunities Fund VIIB Delaware, LP BSC, Angelo Gordon & Co., L.P., Silver Oak Capital LLC & Alden Global Distressed Opportunities Fund, L.P.</p> <p>Senior Lender Class¹³</p> <p><u>LBO Lenders</u>: “[E]ach of the banks and other lenders participating currently, previously or in the future in the Senior Credit Facility and the Bridge Facility”</p> <p><u>LBO Lender Disgorgement Defendants</u>: See Exhibit D to the Creditors’ Committee LBO Lender Complaint.</p> <p>Current LBO Debtholder Defendants: LBO Lenders that currently hold an interest in the Senior Credit Facility or the Bridge Facility</p> <p>Wells Fargo¹⁴ (as Bridge Loan Agent)</p> <p><u>Bridge Lender Defendants</u>: Marathon Special Opportunity Master Fund Ltd., King Street Acquisition Company L.L.C. & Corporate Debt Opportunities Fund L.P.</p> <p>Bridge Lender Class¹⁵</p>	<p>Avoidance of LBO Obligations, Equity Value Transfers & LBO Repayments</p> <p>Subordination of Bank Claims & Guarantee Claims</p> <p>Disallowance of Bank Claims & Guarantee Claims</p> <p>Recovery of LBO Repayments & Equity Value Transfers plus interest, attorney’s fees and costs of suit and collection</p> <p>Preservation of Equity Value Transfers for benefit of Company’s estate</p> <p>Prevention from sharing in benefits, proceeds, and/or value recovered and preserved by foregoing actions</p>

¹³ The Senior Lender Class is the class of defendants represented by the Senior Lender Defendants.

¹⁴ Wells Fargo Bank N.A. (“Wells Fargo”).

¹⁵ The Bridge Lender Class is the class of defendants represented by the Bridge Lender Defendants.

Cause of Action	Defendant(s)	Relief Sought
<p>Actual Fraud (i) to avoid (a) LBO Obligations, (b) Equity Value Transfers, (c) 2006 Repayment, (d) LBO Repayments, and (e) LBO Fees, and (ii) to recover (w) Equity Value Transfers, (x) 2006 Repayment, (y) LBO Repayments, and (z) LBO Fees</p> <p>(11 U.S.C. §§ 544(b), 548(a)(1)(A), 550(a) & 551)</p>	<p>JPMCB (individually and as Senior Loan Agent)</p> <p>MLCC (individually and as former Bridge Loan Agent)</p>	<p>Avoidance of LBO Obligations, Equity Value Transfers, 2006 Repayment, LBO Fees & LBO Repayments</p> <p>Subordination of Bank Claims & Guarantee Claims</p> <p>Disallowance of Bank Claims & Guarantee Claims</p> <p>Recovery of 2006 Repayment, LBO Repayments, LBO Fees & Equity Value Transfers plus interest, attorney's fees and costs of suit and collection</p> <p>Preservation of Equity Value Transfers for benefit of Company's estate</p> <p>Prevention from sharing in benefits, proceeds, and/or value recovered and preserved by foregoing actions</p>

Cause of Action	Defendant(s)	Relief Sought
<p>Actual Fraud (i) to avoid (a) LBO Obligations, (b) Equity Value Transfers, (c) 2006 Repayment, (d) LBO Repayments, and (e) LBO Fees, and (ii) to recover (w) Equity Value Transfers, (x) 2006 Repayment, (y) LBO Repayments, and (z) LBO Fees</p> <p>(11 U.S.C. §§ 544(b), 548(a)(1)(A), 550(a) & 551)</p>	<p><u>Senior Lender Defendants</u>: Oaktree Capital Management, L.P., OCM Opportunities Fund VIIB Delaware, LP BSC, Angelo Gordon & Co., L.P., Silver Oak Capital LLC & Alden Global Distressed Opportunities Fund, L.P.</p> <p>Senior Lender Class</p> <p><u>LBO Lenders</u>: “[E]ach of the banks and other lenders participating currently, previously or in the future in the Senior Credit Facility and the Bridge Facility”</p> <p><u>LBO Lender Disgorgement Defendants</u>: See Exhibit D to the Creditors’ Committee LBO Lender Complaint.</p> <p><u>LBO Fee Defendants</u>: See Exhibit E to the Creditors’ Committee LBO Lender Complaint.</p> <p>Current LBO Debtholder Defendants: LBO Lenders that currently hold an interest in the Senior Credit Facility or the Bridge Facility</p> <p>Wells Fargo (as Bridge Loan Agent)</p> <p><u>Bridge Lender Defendants</u>: Marathon Special Opportunity Master Fund Ltd., King Street Acquisition Company L.L.C. & Corporate Debt Opportunities Fund L.P.</p> <p>Bridge Lender Class</p>	<p>Avoidance of LBO Obligations, Equity Value Transfers, 2006 Repayment, LBO Fees & LBO Repayments</p> <p>Subordination of Bank Claims & Guarantee Claims</p> <p>Disallowance of Bank Claims & Guarantee Claims</p> <p>Recovery of 2006 Repayment, LBO Repayments, LBO Fees, & Equity Value Transfers plus interest, attorney’s fees and costs of suit and collection</p> <p>Preservation of Equity Value Transfers for benefit of Company’s estate</p> <p>Prevention from sharing in benefits, proceeds, and/or value recovered and preserved by foregoing actions</p>

Cause of Action	Defendant(s)	Relief Sought
<p>Actual Fraud (i) to avoid (a) LBO Obligations, (b) Equity Value Transfers, (c) 2006 Repayment, (d) LBO Repayments, and (e) LBO Fees, and (ii) to recover (w) Equity Value Transfers, (x) 2006 Repayment, (y) LBO Repayments, and (z) LBO Fees</p> <p>(11 U.S.C. §§ 544(b), 548(a)(1)(A), 550(a) & 551)</p>	<p><u>2006 Bank Debt Lenders</u>: See Exhibit C to the Creditors' Committee LBO Lender Complaint.</p>	<p>Avoidance of LBO Obligations, Equity Value Transfers, 2006 Repayment, LBO Fees & LBO Repayments</p> <p>Subordination of Bank Claims & Guarantee Claims</p> <p>Disallowance of Bank Claims & Guarantee Claims</p> <p>Recovery of 2006 Repayment, LBO Repayments, LBO Fees, & Equity Value Transfers plus interest, attorney's fees and costs of suit and collection</p> <p>Preservation of Equity Value Transfers for benefit of Company's estate</p> <p>Prevention from sharing in benefits, proceeds, and/or value recovered and preserved by foregoing actions</p>
<p>Actual Fraud (i) to avoid (a) Step Two Notes, (b) Step Two Guarantees, (c) Step Two Equity Value Transfers, (d) Step Two Repayments, and (e) Step Two LBO Fees, and (ii) to recover (x) Step Two Equity Value Transfers, (y) Step Two Repayments, and (z) Step Two LBO Fees</p> <p>(11 U.S.C. §§ 544(b), 548(a)(1)(A) 550(a) & 551)</p>	<p>JPMCB (individually and as Senior Loan Agent) MLCC (individually and as former Bridge Loan Agent)</p>	<p>Avoidance of Step Two Notes, Step Two Guarantees, Step Two Equity Value Transfers, Step Two Repayments & Step Two LBO Fees</p> <p>Subordination of Bank Claims & Guarantee Claims</p> <p>Disallowance of Bank Claims & Guarantee Claims</p> <p>Recovery of Step Two Repayments, Step Two LBO Fees & Step Two Equity Value Transfers plus interest, attorney's fees and costs of suit and collection</p> <p>Preservation of Step Two Equity Value Transfers for benefit of Company's estate</p> <p>Prevention from sharing in benefits, proceeds, and/or value recovered and preserved by foregoing actions</p>

Cause of Action	Defendant(s)	Relief Sought
<p>Actual Fraud (i) to avoid (a) Step Two Notes, (b) Step Two Guarantees, (c) Step Two Equity Value Transfers, (d) Step Two Repayments, and (e) Step Two LBO Fees, and (ii) to recover (x) Step Two Equity Value Transfers, (y) Step Two Repayments, and (z) Step Two LBO Fees</p> <p>(11 U.S.C. §§ 544(b), 548(a)(1)(A) 550(a) & 551)</p>	<p><u>Senior Lender Defendants</u>: Oaktree Capital Management, L.P., OCM Opportunities Fund VIIB Delaware, LP BSC, Angelo Gordon & Co., L.P., Silver Oak Capital LLC & Alden Global Distressed Opportunities Fund, L.P.</p> <p>Senior Lender Class</p> <p><u>LBO Lenders</u>: “[E]ach of the banks and other lenders participating currently, previously or in the future in the Senior Credit Facility and the Bridge Facility”</p> <p><u>LBO Lender Disgorgement Defendants</u>: See Exhibit D to the Creditors’ Committee LBO Lender Complaint.</p> <p><u>Step Two LBO Fee Defendants</u>: “Certain of the LBO Fee Defendants” that received LBO Fees in connection with Step Two</p> <p>Current LBO Debtholder Defendants: LBO Lenders that currently hold an interest in the Senior Credit Facility or the Bridge Facility</p> <p>Wells Fargo (as Bridge Loan Agent)</p> <p><u>Bridge Lender Defendants</u>: Marathon Special Opportunity Master Fund Ltd., King Street Acquisition Company L.L.C. & Corporate Debt Opportunities Fund L.P.</p> <p>Bridge Lender Class</p>	<p>Avoidance of Step Two Notes, Step Two Guarantees, Step Two Equity Value Transfers, Step Two Repayments & Step Two LBO Fees</p> <p>Subordination of Bank Claims & Guarantee Claims</p> <p>Disallowance of Bank Claims & Guarantee Claims</p> <p>Recovery of Step Two Repayments, Step Two LBO Fees & Step Two Equity Value Transfers plus interest, attorney’s fees and costs of suit and collection</p> <p>Preservation of Step Two Equity Value Transfers for benefit of Company’s estate</p> <p>Prevention from sharing in benefits, proceeds, and/or value recovered and preserved by foregoing actions</p>
<p>Estoppel to Prevent LBO Lenders from Benefitting from the Avoidance of Step Two Obligations & Transfers</p> <p>(11 U.S.C. § 551)</p>	<p>JPMCB (individually and as Senior Loan Agent)</p> <p>MLCC (individually and as former Bridge Loan Agent)</p>	<p>Subordination of Bank Claims, Guarantee Claims & LBO Debt</p> <p>Disallowance of Bank Claims, Guarantee Claims & LBO Debt</p> <p>Preservation of Equity Value Transfers for benefit of Company’s estate</p> <p>Estoppel/prevention of Step One Lenders from sharing in recovery of avoided Equity Value Transfers, LBO Repayments, LBO Fees, LBO Guarantees & Pledge</p>

Cause of Action	Defendant(s)	Relief Sought
<p>Estoppel to Prevent LBO Lenders from Benefitting from the Avoidance of Step Two Obligations & Transfers</p> <p>(11 U.S.C. § 551)</p>	<p><u>Senior Lender Defendants</u>: Oaktree Capital Management, L.P., OCM Opportunities Fund VIIB Delaware, LP BSC, Angelo Gordon & Co., L.P., Silver Oak Capital LLC & Alden Global Distressed Opportunities Fund, L.P.</p> <p>Senior Lender Class</p> <p><u>LBO Lender Disgorgement Defendants</u>: See Exhibit D to the Creditors’ Committee LBO Lender Complaint.</p> <p><u>LBO Lenders</u>: “[E]ach of the banks and other lenders participating currently, previously or in the future in the Senior Credit Facility and the Bridge Facility”</p> <p><u>LBO Fee Defendants</u>: See Exhibit E to the Creditors’ Committee LBO Lender Complaint.</p> <p>Current LBO Debtholder Defendants: LBO Lenders that currently hold an interest in the Senior Credit Facility or the Bridge Facility</p> <p>Wells Fargo (as Bridge Loan Agent)</p> <p><u>Bridge Lender Defendants</u>: Marathon Special Opportunity Master Fund Ltd., King Street Acquisition Company L.L.C. & Corporate Debt Opportunities Fund L.P.</p> <p>Bridge Lender Class</p>	<p>Subordination of Bank Claims, Guarantee Claims & LBO Debt</p> <p>Disallowance of Bank Claims, Guarantee Claims & LBO Debt</p> <p>Preservation of Equity Value Transfers for benefit of Company’s estate</p> <p>Estoppel/prevention of Step One Lenders from sharing in recovery of avoided Equity Value Transfers, LBO Repayments, LBO Fees, LBO Guarantees & Pledge</p>
<p>Estoppel to Prevent LBO Lenders from Benefitting from the Avoidance/Recovery of Step Two Intentional Fraudulent Transfers</p> <p>(11 U.S.C. § 551)</p>	<p>JPMCB (individually and as Senior Loan Agent)</p> <p>MLCC (individually and as former Bridge Loan Agent)</p>	<p>Subordination of Bank Claims, Guarantee Claims & LBO Debt</p> <p>Disallowance of Bank Claims, Guarantee Claims & LBO Debt</p> <p>Preservation of Equity Value Transfers for benefit of Company’s estate</p> <p>Estoppel/prevention of Step One Lenders from sharing in recovery of avoided Equity Value Transfers, LBO Repayments, LBO Fees, LBO Guarantees & Pledge</p>

Cause of Action	Defendant(s)	Relief Sought
<p>Estoppel to Prevent LBO Lenders from Benefitting from the Avoidance/Recovery of Step Two Intentional Fraudulent Transfers</p> <p>(11 U.S.C. § 551)</p>	<p><u>Senior Lender Defendants</u>: Oaktree Capital Management, L.P., OCM Opportunities Fund VIIB Delaware, LP BSC, Angelo Gordon & Co., L.P., Silver Oak Capital LLC & Alden Global Distressed Opportunities Fund, L.P.</p> <p>Senior Lender Class</p> <p><u>LBO Lender Disgorgement Defendants</u>: See Exhibit D to the Creditors’ Committee LBO Lender Complaint.</p> <p><u>LBO Lenders</u>: “[E]ach of the banks and other lenders participating currently, previously or in the future in the Senior Credit Facility and the Bridge Facility</p> <p><u>LBO Fee Defendants</u>: See Exhibit E to the Creditors’ Committee LBO Lender Complaint.</p> <p>Current LBO Debtholder Defendants: LBO Lenders that currently hold an interest in the Senior Credit Facility or the Bridge Facility</p> <p>Wells Fargo (as Bridge Loan Agent)</p> <p><u>Bridge Lender Defendants</u>: Marathon Special Opportunity Master Fund Ltd., King Street Acquisition Company L.L.C. & Corporate Debt Opportunities Fund L.P..</p> <p>Bridge Lender Class</p>	<p>Subordination of Bank Claims, Guarantee Claims, & LBO Debt</p> <p>Disallowance of Bank Claims, Guarantee Claims, & LBO Debt</p> <p>Preservation of Equity Value Transfers for benefit of Company’s estate</p> <p>Estoppel/prevention of Step One Lenders from sharing in recovery of avoided Equity Value Transfers, LBO Repayments, LBO Fees, LBO Guarantees, & Pledge</p>
<p>Constructive Fraud to Avoid & Recover Payment of LBO Fees</p> <p>(11 U.S.C. §§ 544(b), 548(a)(1)(B) & 550(a))</p>	<p>JPMCB (individually and as Senior Loan Agent)</p> <p>MLCC (individually and as former Bridge Loan Agent)</p>	<p>Avoidance of LBO Fees</p> <p>Recovery of LBO Fees</p>
<p>Constructive Fraud to Avoid & Recover Payment of LBO Fees</p> <p>(11 U.S.C. §§ 544(b), 548(a)(1)(B) & 550(a))</p>	<p><u>LBO Fee Defendants</u>: See Exhibit E to the Creditors’ Committee LBO Lender Complaint.</p> <p>Wells Fargo (as Bridge Loan Agent)</p>	<p>Avoidance of LBO Fees</p> <p>Recovery of LBO Fees</p>
<p>Unjust Enrichment to Recover LBO Repayments & LBO Fees</p>	<p>JPMCB (individually and as Senior Loan Agent)</p> <p>MLCC (individually and as former Bridge Loan Agent)</p>	<p>Recovery of Step One Repayments, Incremental Repayments, Bridge Repayments, LBO Repayments & LBO Fees</p> <p>Prevention from sharing in recoveries or enhanced value resulting from foregoing actions</p>

Cause of Action	Defendant(s)	Relief Sought
Unjust Enrichment to Recover LBO Repayments & LBO Fees	<p><u>LBO Lender Disgorgement Defendants</u>: See Exhibit D to the Creditors' Committee LBO Lender Complaint.</p> <p><u>LBO Fee Defendants</u>: See Exhibit E to the Creditors' Committee LBO Lender Complaint.</p> <p>Wells Fargo (as Bridge Loan Agent)</p>	<p>Recovery of Step One Repayments, Incremental Repayments, Bridge Repayments, LBO Repayments & LBO Fees</p> <p>Prevention from sharing in recoveries or enhanced value resulting from foregoing actions</p>
Unjust Enrichment to Prevent Windfall from Avoidance of Step Two Obligations, Step Two Repayments & Step Two LBO Fees	<p>JPMCB (individually and as Senior Loan Agent)</p> <p>MLCC (individually and as former Bridge Loan Agent)</p>	<p>Recovery of resulting benefits of avoidance and recovery of Step Two Obligations, Step Two LBO Fees & Step Two Repayments to LBO Lenders</p> <p>Prevention from sharing in recoveries or enhanced value resulting from foregoing actions</p>
Unjust Enrichment to Prevent Windfall from Avoidance of Step Two Obligations, Step Two Repayments & Step Two LBO Fees	<p><u>Senior Lender Defendants</u>: Oaktree Capital Management, L.P., OCM Opportunities Fund VIIB Delaware, LP BSC, Angelo Gordon & Co., L.P., Silver Oak Capital LLC & Alden Global Distressed Opportunities Fund, L.P.</p> <p>Senior Lender Class</p> <p><u>LBO Lenders</u>: "[E]ach of the banks and other lenders participating currently, previously or in the future in the Senior Credit Facility and the Bridge Facility"</p> <p>Current LBO Debtholder Defendants: LBO Lenders that currently hold an interest in the Senior Credit Facility or the Bridge Facility</p> <p>Wells Fargo (as Bridge Loan Agent)</p> <p><u>Bridge Lender Defendants</u>: Marathon Special Opportunity Master Fund Ltd., King Street Acquisition Company L.L.C. & Corporate Debt Opportunities Fund L.P.</p> <p>Bridge Lender Class</p>	<p>Recovery of resulting benefits of avoidance and recovery of Step Two Obligations, Step Two LBO Fees & Step Two Repayments to LBO Lenders</p> <p>Prevention from sharing in recoveries or enhanced value resulting from foregoing actions</p>
Preference to Avoid & Recover LBO Preferences (11 U.S.C. §§ 547(b) & 550(a))	<p>JPMCB (individually and as Senior Loan Agent)</p> <p>MLCC (individually and as former Bridge Loan Agent)</p>	<p>Avoidance of LBO Preferences</p> <p>Recovery of LBO Preferences</p> <p>Prevention from sharing in recoveries or enhanced value resulting from foregoing</p>

Cause of Action	Defendant(s)	Relief Sought
Preference to Avoid & Recover LBO Preferences (11 U.S.C. §§ 547(b) & 550(a))	<u>LBO Lender Preference Defendants</u> : See Exhibit G to the Creditors' Committee LBO Lender Complaint. Wells Fargo (as Bridge Loan Agent)	Avoidance of LBO Preferences Recovery of LBO Preferences Prevention from sharing in recoveries or enhanced value resulting from foregoing
Equitable Subordination & Disallowance	All Defendants in the Creditors' Committee LBO Lender Complaint	Subordination of Bank Claims & LBO Guarantee Claims Disallowance of Bank Claims & LBO Guarantee Claims Prevention from sharing in recoveries or enhanced value resulting from foregoing
Constructive Fraud to Avoid & Recover Payment of 2006 Bank Debt (11 U.S.C. §§ 544(b), 548(a)(1)(B), 550(a) & 551)	JPMCB (individually and as Senior Loan Agent) MLCC (individually and as former Bridge Loan Agent)	Avoidance of 2006 Bank Debt repayment Recovery of 2006 Bank Debt repayment Prevention from sharing in recoveries or enhanced value resulting from foregoing
Constructive Fraud to Avoid & Recover Payment of 2006 Bank Debt (11 U.S.C. §§ 544(b), 548(a)(1)(B), 550(a) & 551)	Wells Fargo (as Bridge Loan Agent) <u>2006 Bank Debt Lenders</u> : See Exhibit C to the Creditors' Committee LBO Lender Complaint. Citicorp ¹⁶ (as agent)	Avoidance of 2006 Bank Debt repayment Recovery of 2006 Bank Debt repayment Prevention from sharing in recoveries or enhanced value resulting from foregoing
Claim Disallowance (11 U.S.C. § 502(d))	All Defendants in the Creditors' Committee LBO Lender Complaint	Disallowance of any claim held by defendants pending payment or turnover of avoided property Prevention from sharing in recoveries or enhanced value resulting from foregoing

¹⁶ Citicorp North America, Inc. ("Citicorp").

Cause of Action	Defendant(s)	Relief Sought
Aiding & Abetting Breaches of Fiduciary Duty	JPMCB Merrill Lynch	Compensatory Damages, Costs & Further Relief TBD Prevention from sharing in recoveries or enhanced value resulting from foregoing
Aiding & Abetting Breaches of Fiduciary Duty	Citigroup Bank of America	Compensatory Damages, Costs & Further Relief TBD Prevention from sharing in recoveries or enhanced value resulting from foregoing
Constructive Fraud to Avoid & Recover Payment of Advisory Fees (11 U.S.C. §§ 544(b), 548(a)(1)(B), 550(a) & 551)	CGMI Merrill	Avoidance of Advisory Fees Recovery of Advisory Fees Prevention from sharing in recoveries or enhanced value resulting from foregoing
Professional Malpractice	CGMI Merrill	Damages, Costs & Further Relief TBD Prevention from sharing in recoveries or enhanced value resulting from foregoing