In re Tribune Company, et al.

Alternative Proposed Schedule for Disclosure/Confirmation

Plan Solicitation/Confirmation	
Date	***Event***
Jan. 17	File Amendments to SDD, Plan, Allocation Dispute Protocol and Solicitation Procedures (if necessary)
Jan. 27	Last Day to Serve Confirmation Discovery Requests
Jan. 30	Objection Deadline for SDD and Solicitation Procedures Motion
Feb. 6	Reply Deadline for SDD and Solicitation Procedures Motion
Feb. 13 (week of)	Hearing on SDD and Solicitation Procedures Motion
Mar. 19	Completion of Confirmation Discovery
Mar. 19	Voting/Plan Objection Deadline
Apr. 2	Briefs in Support of Confirmation/Plan Objection Reply Deadline
Apr. 9 (week of)	Confirmation Hearing

Allocation Dispute Resolution[4] (Schedule Identical to Exhibit A)	
Date	***Event***
Jan. 20	Last Day to Serve Discovery Requests
Jan. 31	Identification of Allocation Dispute Positions, Trial Witnesses and Scope of Direct Trial Testimony
Feb. 17	Completion of Discovery
Feb. 24	Opening Briefs Due
Mar. 2	Response Briefs Due
Mar. 5 (week of)	Hearing on Allocation Disputes

[4] Discovery shall be limited to the following:

- Discovery directed to parties taking a position that any Other Parent Claims are entitled to the benefit of the PHONES and/or EGI subordination provisions, seeking the operative documents pursuant to which such Other Parent Claims arise;
- Discovery directed to EGI-TRB LLC and the Debtors, relating to whether the PHONES Notes are senior, junior or *pari passu* in right of payment to the EGI-TRB LLC Notes;
- Discovery directed to the Debtors and/or DBTCA, seeking documents relating to the appropriate amount of the PHONES Notes; and
- Discovery re: Recovery Chart, depending upon review of revised Recovery Chart, directed to Debtors, their professionals and any party and its professionals that challenges or reserves the right to challenge the Recovery Chart.