

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

)	
In re:)	Chapter 11 Cases
)	Case No. 08-13141 (KJC)
TRIBUNE COMPANY, et al.,)	(Jointly Administered)
)	
Debtors.)	
)	

**STIPULATION ON TRIAL BALANCE REPORTS RELEVANT TO THE
ALLOCATION DISPUTES**

Tribune Company (“Tribune”), on its own behalf and on behalf of each jointly administered debtor (collectively, the “Debtors”), and the TM Retirees, by and through their respective attorneys, HEREBY STIPULATE and AGREE to the following facts (the “Stipulated Facts”), solely in connection with the Allocation Disputes, as defined in the Court’s scheduling order (the “Scheduling Order”) dated January 24, 2012 [Docket No. 10692], to be resolved at the Allocation Disputes hearing scheduled for March 5 and 6, 2012. All parties’ objections regarding the relevance and weight of the Stipulated Facts to the Allocation Disputes are hereby expressly preserved.

WHEREAS the Scheduling Order establishes a procedure for the litigation of certain Allocation Disputes defined therein;

IT IS HEREBY STIPULATED AND AGREED by the Parties hereto, by their undersigned counsel, as follows:

- 1) In response to a request from the TM Retirees, on February 22, 2012, Debtors produced two Tribune Consolidated trial balance reports supporting (a) the “Employee Compensation and Benefits” and “Deferred Compensation and Benefits” lines from the Company’s 2007 10K filing, and (b) the “Accounts payable, accrued expenses and other current

liabilities” line from the Company’s Q3 2008 10Q filing. See TRB2000126 through TRB 2000133.

2) The following documents may be treated for evidentiary purposes in connection with the Allocation Disputes as Records of a Regularly Conducted Activity as that phrase is used in Federal Rule of Evidence 803(6) without the need for testimony by the custodian or another qualified witness or a certification that complies with Federal Rule of Evidence 902(11):

A. TRB2000126 through TRB2000133.

IN WITNESS WHEREOF and in agreement herewith, by and through their counsel, the Parties have executed and delivered this Stipulation as of the date first set forth below.

Dated: February __, 2012
Wilmington, Delaware

**COLE, SCHOTZ, MEISEL,
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Dated: February __, 2012
Wilmington, Delaware

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So Ordered:

United States Bankruptcy Judge