

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:  PITTSBURGH ATHLETIC ASSOCIATION, et al. <sup>1</sup>  Debtor.	Bankruptcy No. 17-22222-JAD (Jointly Administered)  Chapter 11  Related Doc. Nos.: 702, 724, 807 and 808  Hearing Date and Time: May 30, 2018 at 10:00 AM
_____ PITTSBURGH ATHLETIC ASSOCIATION, et al.,  Movant,  v.  MCKNIGHT REALTY PARTNERS, <i>as assignee of Martin S. Samuels and Johanna S. Samuels,</i>  Respondent.	

**MCKNIGHT REALTY PARTNERS' WITHDRAWAL OF JOINDER TO THE JOINT  
OBJECTION TO [THIRD REVISED] AMENDED JOINT PLAN OF  
REORGANIZATION DATED MARCH 16, 2018 (as revised April 22, 2018) AND  
ACCOMPANYING DISCLOSURE STATEMENT AND WITHDRAWAL OF  
ADDITIONAL OBJECTION TO [THIRD REVISED] AMENDED JOINT PLAN OF  
REORGANIZATION DATED MARCH 16, 2018 (as revised April 22, 2018 AND  
ACCOMPANYING DISCLOSURE STATEMENT**

AND NOW, comes McKnight Realty Partners ("McKnight"), a Creditor of the Pittsburgh Athletic Association, by and through its Counsel, Kirk B. Burkley, Esq. and the law firm of Bernstein-Burkley, P.C., and files the within *Withdrawal of Joinder to the Joint Objection to the [Third Revised] Amended Joint Plan of Reorganization Dated March 16, 2018 (as revised April 22, 2018) and Accompanying Disclosure Statement and Withdrawal of Additional Objection to the*

<sup>1</sup> 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

*[Third Revised] Amended Joint Plan of Reorganization Dated March 16, 2018 (as revised April 22, 2018) and Accompanying Disclosure Statement* as follows:

**Background**

1. On April 22, 2018, the Debtors filed a [Third Revised] Amended Joint Plan of Reorganization dated March 16, 2018 (as revised April 22, 2018) [Doc No. 702] (“Third Revised Amended Joint Plan”).

2. On April 24, 2018, the Debtors filed their [Revised] Impaired Class Joint Disclosure Statement to Accompany the Joint Plan of Reorganization Dated March 13, 2018 (as revised April 24, 2018) [Doc. No. 717] (the “April 24, 2018 Joint Disclosure Statement”)

3. On May 23, 2018, Irwin Kotovsky, Richard J. Velan, Yvonne Rose and Kay Merge, by and through their counsel, filed a Joint Objection to [Third Revised] Amended Joint Plan of Reorganization Dated March 16, 2018 (as revised April 22, 2018) and accompanying Disclosure Statement (the “Joint Objection”). [Doc. No.807].

4. Also on May 23, 2018, McKnight filed a Joinder to the Joint Objection to the [Third Revised] Amended Joint Plan of Reorganization Dated March 16, 2018 (as revised April 22, 2018) and Accompanying Disclosure Statement and Additional Objection to the [Third Revised] Amended Joint Plan of Reorganization Dated March 16, 2018 (as revised April 22, 2018) and Accompanying Disclosure Statement. (“McKnight Joinder and Objection”) [Doc. No. 808]

**Withdrawal of Joinder and Objection**

5. Throughout the process, McKnight consistently maintained that it was interested in purchasing the Debtors’ assets only if a constituency of Debtors’ estate wanted McKnight to be the redevelopment partner.

6. After having an opportunity to review the results of the balloting, McKnight understands that all of the impaired classes, including the members, have voted to proceed with the Debtor's proposed redevelopment plans.

7. Therefore, McKnight hereby withdraws its Joinder and Objection as well as McKnight's offer to purchase made on April 23, 2018.

WHEREFORE, McKnight Realty Partners respectfully requests that the Court deem the Joinder and Objection and April 23, 2018 offer withdrawn on the record.

Dated: 5/25/2018

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

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IN RE:  PITTSBURGH ATHLETIC ASSOCIATION, et al.  Debtor.	Bankruptcy No. 17-22222-JAD (Jointly Administered)  Chapter 11
<hr/> PITTSBURGH ATHLETIC ASSOCIATION, et al.,  Movant,  v.  MCKNIGHT REALTY PARTNERS, <i>as assignee of Martin S. Samuels and Johanna S. Samuels,</i>  Respondent.	

**CERTIFICATE OF SERVICE**

I, Kirk B. Burkley, hereby certify that this 25<sup>th</sup> day of May, 2018, a true and correct copy of the within *Withdrawal of Joinder to the Joint Objection to the [Third Revised] Amended Joint Plan of Reorganization Dated March 16, 2018 (as revised April 22, 2018) and Accompanying Disclosure Statement and Withdrawal of Additional Objection to the [Third Revised] Amended Joint Plan of Reorganization Dated March 16, 2018 (as revised April 22, 2018) and Accompanying Disclosure Statement* via the Court's CM/ECF system upon the following:

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