

Objection Deadline: March 4, 2009 at 5:00 p.m. (prevailing Eastern Time)
Hearing Date: March 11, 2009 at 2:00 p.m. (prevailing Eastern Time)
and following thereafter

DAVIS POLK & WARDWELL

450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
Facsimile: (212) 701-6001
Marshall S. Huebner
Avi Gesser
James I. McClammy

Counsel to the Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: :
: **Chapter 11 Case No.**
:
STAR TRIBUNE HOLDINGS : **09-10244 (RDD)**
CORPORATION, et al., :
: **(Jointly Administered)**
:
Debtors. :
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**NOTICE OF THE STAR TRIBUNE COMPANY’S MOTION TO REJECT
ITS COLLECTIVE BARGAINING AGREEMENT WITH
GCC/IBT LOCAL 1-M PURSUANT TO 11 U.S.C. § 1113 AND REQUEST
FOR EXTENSION OF COMMENCEMENT OF HEARING**

The Star Tribune Company (“**Star Tribune**” or the “**Company**” and, together with Star Tribune Holdings Corporation, the “**Debtors**”) respectfully moves, pursuant to 11 U.S.C. § 1113(c) for an Order (1) authorizing it to reject the collective bargaining agreement between the Star Tribune and the Graphic Communications Conference/International Brotherhood of Teamsters (“**GCC/IBT**”) Local 1-M (the “**Pressmen**” or the “**Union**”) effective as of December 1, 2000 and expiring November 30, 2010; and (2) authorizing the Star

Tribune to implement the terms of the Star Tribune's bargaining proposal to the Union.

BACKGROUND AND JURISDICTION

1. On January 15, 2009, each Debtor commenced with this Court a voluntary case under chapter 11 of title 11 of the United States Code, 11 U.S.C. § 101 et seq. (the "**Bankruptcy Code**"). The Debtors are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. These chapter 11 cases are being jointly administered pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**").

2. This Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b) and may be heard and determined by the Bankruptcy Court. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory predicate for the relief requested herein is Section 1113 of the Bankruptcy Code.

RELIEF REQUESTED

4. By this motion (the "**Motion**"), the Debtors respectfully request that this Court grant an order (1) authorizing them to reject the collective bargaining agreement between the Star Tribune and the Pressmen; and (2) authorizing them to implement the terms of the Star Tribune's bargaining proposal to the Pressmen. In support of the Motion, the Star Tribune has submitted, contemporaneously with this notice, a memorandum of law and

declarations of Stephen J. Walstead, Randy Lebedoff, Kevin Desmond, Adrienne Sirany and Paul P. Huffard.

5. The Debtors also respectfully request that this Court, pursuant to its authority under 11 U.S.C. § 1113(d)(1), extend the time for the commencement of a hearing where the circumstances of the case and the interests of justice require, and enter an order in the form attached hereto scheduling a hearing on Debtors' Motion to commence on March 11, 2009, in order to allow for additional, though limited, time for the Pressmen to end the delay and commence substantive negotiations toward an agreed resolution.

NOTICE

6. No trustee or examiner has been appointed in these chapter 11 cases. Pursuant to the Order Establishing Certain Notice, Case Management and Administrative Procedures entered by the Court on January 16, 2009 (the "**Case Management Order**"), the Debtors will serve notice of this Motion and the supporting memorandum of law, declarations and exhibits on the Pressmen, the Core Parties and the Non-ECF Service Parties (as those terms are defined in the Case Management Order). Consistent with Star Tribune's request to file certain confidential information under seal, redacted versions of the memorandum of law, certain declarations and exhibits will be electronically filed and served on parties other than the Pressmen and the Core Parties. All parties who have requested electronic notice of filings in these cases through the Court's ECF system will automatically receive notice of this Motion no later than the day after its filing with the Court. Moreover, a copy of this Motion and any Order approving it will

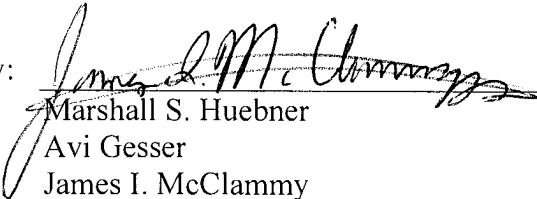
be made available on the Debtors' Case Information Website (located at www.startribunereorg.com). In light of the relief requested, the Debtors submit that no further notice is necessary.

7. No previous request for the relief sought herein has been made by the Debtors to this or any other court.

CONCLUSION

WHEREFORE the Debtors respectfully request that a hearing be held pursuant to Section 1113 on March 11, 2009, and that the Court grant the Debtors the relief requested herein.

New York, New York
Dated: February 19, 2009

By: 
Marshall S. Huebner
Avi Gesser
James I. McClammy

DAVIS POLK & WARDWELL
450 Lexington Avenue
New York, New York 10017
Telephone: (212) 450-4000
Facsimile: (212) 450-6501

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