

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF SOUTH CAROLINA**

RONALD FRIEDMAN, as trustee for	)	
the SportCo Creditors' Liquidation	)	
Trust,	)	Adversary No. 19-80071-dd
	)	
Plaintiff,	)	
	)	
	)	
v.	)	
	)	
WELLSPRING CAPITAL	)	
MANAGEMENT LLC, WELLSPRING	)	
CAPITAL PARTNERS IV, L.P., WCM	)	
GENPAR IV, L.P., WCM GENPAR IV	)	
GP, LLC, ALEXANDER E. CARLES,	)	
BRADLEY JOHNSON, F. HEWITT	)	
GRANT, CHARLES E. WALKER, JR.,	)	
TODD BOEHLY, BERNARD	)	
ZIOMEK, and ANDREW KUPCHIK,	)	
	)	
Defendants.	)	
	)	

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**REPLY MEMORANDUM IN SUPPORT OF MOTION TO DISMISS  
OF DEFENDANT, ANDREW KUPCHIK**

Defendant, Andrew Kupchik, respectfully submits this Reply Memorandum in support of his Motion to Dismiss dated February 19, 2020. [Doc.# 92]. Mr. Kupchik joins in the arguments of the Wellspring Defendants in their Reply Brief [Doc #118] insofar as they seek dismissal of Counts 1 and 2 of the Amended Complaint, the Counts asserted against Mr. Kupchik. Mr. Kupchik also joins in the arguments of the Defendant, Todd Boehly, in his Reply Brief [Doc. #120]. Mr. Kupchik, like Mr. Boehly, is a small, minority shareholder of the Debtors who is not alleged to have participated in the management of the Debtors.

For all the reasons set forth in Mr. Kupchik's Motion to Dismiss, the Memorandum and Reply filed by the Wellspring Defendants, and the Memorandum and Reply filed by Mr. Boehly, Counts 1 and 2 of the Complaint should be dismissed with prejudice against Mr. Kupchik.

Dated: April 22, 2020

Respectfully submitted,

/s/ Lindsay A. Joyner

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