

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.**<sup>1</sup> :   
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**DECLARATION AND DISCLOSURE STATEMENT OF  
CAROL H. HEARN, ON BEHALF OF CAROL HEARN, ESQ.**

Carol H. Hearn, declares and says:

1. I am the sole practitioner/owner of Carol Hearn, Esq., located at 705 Olive Lane, Plymouth, MN 55447 (the “**Firm**”).

2. Star Tribune Holdings Corporation (“**Star Tribune Holdings**”) and The Star Tribune Company (“**Star Tribune**” and, together with Star Tribune Holdings, the “**Debtors**”) have requested that the Firm provide legal services to the Debtors, and the Firm has consented to provide those services.

3. The Firm may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are claimants or other parties in interest in the Debtors’ chapter 11 cases. The Firm does not perform services for any such person in connection with these chapter 11 cases.


<sup>1</sup> The Debtors are Star Tribune Holdings Corporation and The Star Tribune Company. The employer tax identification numbers and addresses for each of the Debtors are set forth in the Debtors’ chapter 11 petitions.

4. Neither I nor any partner or associate of the Firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or their estates with respect to the matters on which the Firm is to be employed.

5. Neither I nor any partner or associate of the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any person other than partners and associates of the Firm.

6. The Debtors owe the Firm \$ 5,535.00 for pre-petition services.

7. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Declaration was executed on February 18, 2009.



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Carol H. Hearn

In re Star Tribune Holdings Corp., et al.  
Chapter 11 Case No. 09-10244 (RDD )

RETENTION QUESTIONNAIRE

TO BE COMPLETED BY PROFESSIONALS EMPLOYED BY STAR TRIBUNE HOLDINGS CORPORATION, et al. (the "Debtors").

DO NOT FILE THIS QUESTIONNAIRE WITH THE COURT.  
RETURN IT FOR FILING WITH THE DEBTORS AT:

Davis Polk & Wardwell  
450 Lexington Avenue  
New York, NY 10017  
Attn: Marshall S. Huebner

All questions **must** be answered. Please use "none," "not applicable," or "N/A," as appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address of firm:

Carol Hearn, Esq.  
705 Olive Lane  
Plymouth, MN 55447

Date of retention: 1991

2. Brief description of services to be provided:

Contract and business matters

<sup>7</sup> The Debtors are Star Tribune Holdings Corporation and The Star Tribune Company. The employer tax identification numbers and addresses for each of the Debtors are set forth in the Debtors' chapter 11 petitions.

3. Arrangements for compensation (hourly, contingent, etc.)

hourly

(a) Range of hourly rates (if applicable): \$180 (\$240 less 25% discount)

(b) Estimated average monthly compensation based on pre-petition retention (if firm was employed pre-petition):

\$15,525\*

\* Based on 2007 and 2008 data.

4. Pre-petition claims against any of the Debtors held by the firm:

Amount of claim: \$ 5,535

Date claim arose: 01/15/2009

Source of claim: legal services rendered 01/01/2009 - 01/15/2009

5. Pre-petition claims against any of the Debtors held individually by any of the firm's attorneys:

Name: (Note: Firm is a sole proprietorship, so the

Status: firm's claim, above, is held individually by Carol Hearn)

Amount of claim: \$ (see firm's claim, above)

Date claim arose: (" " " " )

Source of claim: (" " " " )

6. Stock of any of the Debtors currently held by the firm:

Kind of shares: None

No. of shares: \_\_\_\_\_

7. Stock of any of the Debtors currently held individually by any of the firm's attorneys:

Name: None

Status: \_\_\_\_\_

Kind of shares: \_\_\_\_\_

No. of shares: \_\_\_\_\_

8. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates for the matters on which the firm is to be employed.

None

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9. Name of individual completing this form.

Carol Hearn