

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**IN RE:** )  
 )  
**AMERICAN HISTORIC RACING** ) **BK No. 06-06626-MH3-11**  
**MOTORCYCLE ASSOCIATION, LTD.,** )  
 )  
**Debtor.** )

**AGREED ORDER REGARDING CLAIMS OF TEAM OBSOLETE LTD.; TEAM  
OBSOLETE PRODUCTS LTD.; TEAM OBSOLETE PROMOTIONS, INC.; ROBERT T.  
IANNUCCI; JIM REDMAN; RICK VESCO AS EXECUTOR OF ESTATE OF DON  
VESCO; DAVE ROPER; LON MCCROSKEY, M.D; ERIK GREEN; AND JON KAIN  
AND REGARDING CLAIMS, IF ANY, OF THE DEBTOR AGAINST TEAM  
OBSOLETE LTD.; TEAM OBSOLETE PRODUCTS LTD.; TEAM OBSOLETE  
PROMOTIONS, INC.; ROBERT T. IANNUCCI; JIM REDMAN; RICK VESCO AS  
EXECUTOR OF ESTATE OF DON VESCO; DAVE ROPER; LON MCCROSKEY, M.D;  
ERIK GREEN; AND JON KAIN**

It appearing to the Court based upon the signatures of counsel for the Debtor and Team Obsolete Ltd.; Team Obsolete Products Ltd.; Team Obsolete Promotions Inc.; Robert T. Iannucci, Jim Redman, Rick Vesco as Executor of the Estate of Don Vesco; Dave Roper; Lon McCroskey, M.D.; Erik Green and John Kain below, that the parties have resolved certain issues between them, it is, ORDERED as follows:

1. Team Obsolete Ltd.; Team Obsolete Products Ltd.; Team Obsolete Promotions Inc.; Robert T. Iannucci, Jim Redman, Rick Vesco as Executor of the Estate of Don Vesco; Dave Roper; Lon McCroskey, M.D.; Erik Green and John Kain agree to not pursue or assert any claims against the Debtor in any forum, venue, or jurisdiction and their claims shall not be allowed under 11 U.S.C. §502 of the Bankruptcy Code.

2. Team Obsolete Ltd.; Team Obsolete Products Ltd.; Team Obsolete Promotions Inc.; Robert T. Iannucci, Jim Redman, Rick Vesco as Executor of the Estate of Don Vesco; Dave Roper; Lon McCroskey, M.D.; Erik Green and John Kain acknowledge that their perpetiton

claims shall be discharged in a confirmed plan of reorganization which provides for such discharge.

3. Team Obsolete Ltd.; Team Obsolete Products Ltd.; Team Obsolete Promotions Inc.; Robert T. Iannucci, Jim Redman, Rick Vesco as Executor of the Estate of Don Vesco; Dave Roper; Lon McCroskey, M.D.; Erik Green and John Kain agree that they will not object to any provision in the Debtor's plan of reorganization to the extent (and only to the extent) that such provision relates to the discharge of their prepetition claims. The above-referenced parties shall retain the right to object to any provisions in the Debtor's plan of reorganization, but only to the extent that any such plan provision relates to matters other than the discharge of their claims and as to which they have standing to raise such objections.

4. The Debtor agrees not to pursue or assert any claim, if any, for attorney fees and costs against Team Obsolete Ltd.; Team Obsolete Products Ltd.; Team Obsolete Promotions Inc.; Robert T. Iannucci, Jim Redman, Rick Vesco as Executor of the Estate of Don Vesco; Dave Roper; Lon McCroskey, M.D.; Erik Green and John Kain in any forum, venue, or jurisdiction.

This Order was signed and entered electronically as indicated at the top of the first page.

Submitted for Entry:

/s/ Henry E. Hildebrand  
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