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Attorneys for Next Jump, Inc.

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

In re

**BORDERS GROUP, INC., et al.,
Debtors.**

**BORDERS, INC. and BORDERS
PROPERTIES, INC.,
Plaintiffs,**

vs.

**NEXT JUMP, INC.,
Defendant.**

Chapter 11

Case No. 11-10614 (MG)
(Jointly Administered)

Adversary Proceeding No. 11-02567

NEXT JUMP, INC.,

Counterclaimant / Third Party Plaintiff,

vs.

**BORDERS, INC. and BORDERS
PROPERTIES, INC.,**

**Counterclaim
Defendants,**

-and-

DANIEL ANGUS,

Third Party Defendant.

**MOTION OF NEXT JUMP INC. TO WITHDRAW
THE REFERENCE OF THE ABOVE-CAPTIONED
ADVERSARY PROCEEDING FROM THE BANKRUPTCY COURT**

**TO THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK:**

Next Jump, Inc. (“Next Jump”), Defendant in the above-captioned case, respectfully moves the United States District Court for the Southern District of New York for entry of an order, pursuant to 28 U.S.C. §157(d), Federal Rules of Bankruptcy Procedure 5011, and Rule 5011-1 of the Local Rules of the Bankruptcy Court for the Southern District of New York, withdrawing the reference of the above-captioned adversary proceeding to the Bankruptcy Court for the reasons set forth in the accompanying Memorandum of Law, Declaration of Steven Cooper, dated September 15, 2011, and the Exhibits annexed thereto, which are hereby incorporated by reference.

Next Jump has made no prior request to this Court or to any other court for the relief requested by this Motion.

WHEREFORE, Next Jump respectfully requests that the Court enter an order granting the relief requested herein, and such other and further relief as the Court deems just and appropriate.

Dated: New York, New York
September 15, 2011

REED SMITH LLP

By: /s Steven Cooper

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