

# Exhibit 1

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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF ARIZONA

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IN RE: DEWEY RANCH HOCKEY, LLC )  
COYOTES HOLDINGS, LLC, COYOTES ) CASE NO.  
HOCKEY, LLC AND ARENA ) 2:09-BK-09-09488  
MANAGEMENT GROUP, LLC, ) (JOINTLY ADMINISTERED  
 ) CHAPTER 11)  
DEBTORS. )  
----- X

\*\*\*CONTAINS HIGHLY CONFIDENTIAL PORTIONS\*\*\*  
DEPOSITION OF WILLIAM DALY  
NEW YORK, NEW YORK  
AUGUST 21, 2009

REPORTED BY:  
JUDI JOHNSON, RPR, CRR, CLR  
JOB NO.: 24399

Page 2	Page 3
<p>1 2           FOUR TIMES SQUARE           NEW YORK, NEW YORK</p> <p>3 4           AUGUST 21, 2009           9:00 A.M.</p> <p>5 6 7 8 9 10 11 12 13           DEPOSITION OF WILLIAM DALY, HELD AT 14 THE OFFICES OF SKADDEN, ARPS, SLATE, MEAGHER 15 &amp; FLOM, LLP, FOUR TIMES SQUARE, NEW YORK, 16 NEW YORK, PURSUANT TO NOTICE, BEFORE JUDI 17 JOHNSON, A REGISTERED PROFESSIONAL REPORTER, 18 A CERTIFIED REALTIME REPORTER, A CERTIFIED 19 LIVENOTE REPORTER AND NOTARY PUBLIC OF THE 20 STATE OF NEW YORK.</p> <p>21 22 23 24 25</p>	<p>1           WILLIAM DALY</p> <p>2 APPEARANCES:</p> <p>3           JENNINGS STROUSS &amp; SALMON, PLC</p> <p>4           ATTORNEY FOR JERRY MOYES</p> <p>5           201 E. WASHINGTON STREET</p> <p>6           PHOENIX, ARIZONA 85004-2385</p> <p>7</p> <p>8           BY: PETER W. SORENSEN, ESQ.</p> <p>9</p> <p>10           SQUIRE SANDERS &amp; DEMPSEY L.L.P.</p> <p>11           ATTORNEY FOR THE DEBTORS</p> <p>12           40 NORTH CENTRAL AVENUE</p> <p>13           PHOENIX, ARIZONA 85004-4498</p> <p>14</p> <p>15           BY: GEORGE BRANDON, ESQ. (VIA TELEPHONE)</p> <p>16</p> <p>17           BROWN RUDNICK LLP</p> <p>18           ATTORNEY FOR THE CITY OF GLENDALE</p> <p>19           ONE FINANCIAL CENTER</p> <p>20           BOSTON, MASSACHUSETTS 02111</p> <p>21</p> <p>22           BY: (NOT PRESENT)</p> <p>23 24 25</p>
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<p>1           WILLIAM DALY</p> <p>2 APPEARANCES CONTINUED:</p> <p>3           SKADDEN, ARPS, SLATE, MEAGHER &amp; FLOM, LLP</p> <p>4           ATTORNEY FOR THE NATIONAL HOCKEY LEAGUE</p> <p>5           FOUR TIMES SQUARE</p> <p>6           NEW YORK, NEW YORK 10036</p> <p>7</p> <p>8           BY: SHEPARD GOLDFEIN, ESQ.</p> <p>9</p> <p>10           -AND-</p> <p>11           STINSON MORRISON HECKER, LLP</p> <p>12           1850 NORTH CENTRAL AVENUE - SUITE 2100</p> <p>13           PHOENIX, ARIZONA 85004-4584</p> <p>14           BY: (NOT PRESENT)</p> <p>15</p> <p>16</p> <p>17           ALLEN, SALA &amp; BAYNE PLC</p> <p>18           ATTORNEY FOR THE COMMITTEE</p> <p>19           1850 NORTH CENTRAL AVENUE - SUITE 150</p> <p>20           PHOENIX, ARIZONA 85004</p> <p>21</p> <p>22           BY: PAUL SALA, ESQ. (VIA TELEPHONE)</p> <p>23 24 25</p>	<p>1           WILLIAM DALY</p> <p>2 APPEARANCES CONTINUED:</p> <p>3           KATTEN MUCHIN ROSEMAN LLP</p> <p>4           ATTORNEY FOR THE GLENDALE HOCKEY, GLENDALE ARENA</p> <p>5           JERRY REINSDORF</p> <p>6           575 MADISON AVENUE</p> <p>7           NEW YORK, NEW YORK 10022-2585</p> <p>8</p> <p>9           BY: (NOT PRESENT)</p> <p>10</p> <p>11           DEWEY LEBOEUF, LLP</p> <p>12           ATTORNEY FOR PSE</p> <p>13           1301 AVENUE OF THE AMERICAS</p> <p>14           NEW YORK, NEW YORK 10019-6092</p> <p>15</p> <p>16           BY: JEFFREY KESSLER, ESQ.</p> <p>          BIANCA M. FORDE, ESQ.</p> <p>17</p> <p>18</p> <p>19           ALSO PRESENT:</p> <p>20           RICHARD RODIER</p> <p>21 22 23 24 25</p>

<p style="text-align: right;">Page 202</p> <p>1 WILLIAM DALY  2 HERE TODAY THOSE WERE EXACTLY MY COMMENTS, BUT  3 THEY PURPORT TO BE.  4 Q HERE'S MY QUESTION. EARLIER TODAY YOU  5 TESTIFIED THAT YOU WERE PROCESSING THE  6 RELOCATION APPLICATION UNTIL JULY 29th AT SOME  7 POINT. I GUESS MY QUESTION IS, ON JUNE 9, HAD  8 YOU YET RECEIVED THE RELOCATION APPLICATION?  9 A JUST RECENTLY. JUST PRIOR TO THAT.  10 Q DID YOU KNOW IF YOU WERE PROCESSING IT  11 AT THAT TIME?  12 A WELL, I ASSUME WE WERE. BUT EVEN IF  13 WE WERE, WE WERE NOWHERE NEAR COMING TO THE  14 POINT WHERE WE COULD DETERMINE A RELOCATION FEE.  15 Q I'M REALLY FOCUSED ON YOU SAID "WE  16 HAVE A COUPLE OF STEPS BEFORE WE GET TO IT."  17 WHAT DID YOU MEAN?  18 A GET TO DETERMINING A FEE IN A  19 RELOCATION.  20 Q THEN TWO DOWN, IT SAYS, "IS IT  21 NEGOTIABLE?" AND THIS IS REFERRING TO THE  22 RELOCATION FEE. AND THE ANSWER THAT THEY HAVE  23 IS, "WELL, IT HAS TO HAVE A JUSTIFIED BASIS AND  24 SOME CRITERIA AROUND IT, BUT TYPICALLY IN OUR  25 HISTORY, THE NUMBER HAS BEEN TO SOME EXTENT THE</p>	<p style="text-align: right;">Page 203</p> <p>1 WILLIAM DALY  2 PRODUCT OF NEGOTIATION."  3 DID YOU ANSWER SOMETHING TO THAT  4 EFFECT?  5 A YES.  6 Q AND WHAT YOU MEANT BY THAT IS THAT THE  7 PAST RELOCATION FEES, WHILE YOU'VE BEEN AT THE  8 LEAGUE, HAVE NOT BEEN DETERMINED BY THE LEAGUE  9 OR THE EXECUTIVE COMMITTEE BUT HAVE BEEN IN  10 EFFECT A PRODUCT OF NEGOTIATION WITH THE  11 INDIVIDUAL CLUBS; IS THAT FAIR?  12 MR. GOLDFEIN: OBJECT TO THE FORM OF  13 THE QUESTION.  14 A YES.  15 Q HAVE YOU TAKEN ANY STEPS TO TRY TO  16 NEGOTIATE WHAT WOULD BE AN APPROPRIATE  17 RELOCATION FEE WITH MR. BALSILLIE?  18 A NO  19 Q IF THE COURT WERE TO ORDER RELOCATION  20 IN HIS APPROVAL, IS IT THE LEAGUE'S POSITION  21 THAT YOU WOULD BE OPEN TO NEGOTIATING SUCH A  22 FEE, AS YOU'VE DONE IN THE PAST, AS OPPOSED TO  23 DETERMINING SUCH A FEE?  24 MR. GOLDFEIN: OBJECT TO THE FORM OF  25 THE QUESTION.</p>
<p style="text-align: right;">Page 204</p> <p>1 WILLIAM DALY  2 A I HAVEN'T REALLY CONTEMPLATED THAT FAR  3 AHEAD. I BELIEVE WE WOULD TRY TO COME TO GRIPS  4 WITH AND GET OUR ARMS AROUND WHAT AN APPROPRIATE  5 RELOCATION FEE WOULD BE AND THEN, TO THE EXTENT  6 WE ARE ENTERING INTO A CONSENT AGREEMENT, AGAIN,  7 AGAINST OUR OBJECTION, WITH A BUYER THAT OUR  8 OWNERS HAVEN'T APPROVED, I WOULD IMAGINE IN THAT  9 CONTEXT IT MAY BE A PRODUCT OF NEGOTIATION.  10 Q DO YOU AGREE IF YOU EVER GOT TO THE  11 RELOCATION FEE ISSUE, THAT THE SAME STANDARDS  12 AND CRITERIA SHOULD BE APPLIED, WHATEVER THEY  13 ARE, TO THESE SPECIFIC FACTS THAT YOU'VE USED  14 THROUGHOUT THE HISTORY IN THE NHL IN DETERMINING  15 LOCATION FEES?  16 MR. GOLDFEIN: I'M GOING TO OBJECT TO  17 THE FORM OF THE QUESTION.  18 A NOT NECESSARILY. I THINK EACH CASE IS  19 DIFFERENT. AND AS YOU POINTED OUT BEFORE, IN  20 THE PROCESS OF CHANGING TERMS IN A STANDARD  21 CONSENT, YOU LOOK AT THE SITUATION, AND THERE  22 COULD BE A WHOLE BUNCH OF DIFFERENT CRITERIA  23 THAT COULD BEAR ON A DECISION IN A CERTAIN  24 CIRCUMSTANCE.  25 Q I UNDERSTAND THAT THE FACTS COULD BE</p>	<p style="text-align: right;">Page 205</p> <p>1 WILLIAM DALY  2 ENTIRELY DIFFERENT SO THAT THE APPLICATION OF  3 STANDARDS WOULD LEAD TO DIFFERENT RESULTS ON  4 DIFFERENT FACT BUT WOULD YOU AGREE WITH ME  5 THAT THE LEAGUE SHOULD HAVE A NEUTRAL SET OF  6 STANDARDS IN DETERMINING SOMETHING LIKE  7 RELOCATION FEE TO VALUE THE -- WHATEVER'S  8 REQUIRED FOR EACH RELOCATION, APPLYING IT TO THE  9 SPECIFIC FACTS OF THAT CASE?  10 MR. GOLDFEIN: OBJECT TO THE FORM OF  11 THE QUESTION.  12 A I THINK THE STANDARD IS SET FORTH IN  13 BYLAW 36, WHICH IS TO TRY TO VALUE THE GOODWILL  14 THAT'S BEEN DEVELOPED IN THE MARKET IN WHICH THE  15 RELOCATION IS TO TAKE PLACE.  16 Q AND YOU WOULD AGREE THAT THAT'S THE  17 STANDARD THE LEAGUE HAS APPLIED SINCE YOU HAVE  18 BEEN IN THE LEAGUE?  19 A YES, SUBJECT TO NEGOTIATION.  20 Q AND THAT'S BEEN THE STANDARD, SUBJECT  21 TO NEGOTIATION, THAT'S BEEN APPLIED ON ALL THE  22 RELOCATION FEES EITHER IMPOSED OR NOT IMPOSED  23 SINCE YOU'VE BEEN IN THE LEAGUE?  24 A WELL, THERE'S ONLY BEEN ONE RELOCATION  25 FEE SINCE I'VE BEEN IN THE LEAGUE, AND THAT WAS</p>

Page 206	Page 207
<p>1 WILLIAM DALY</p> <p>2 IN CONNECTION WITH HARTFORD'S MOVE TO CAROLINA,</p> <p>3 BUT I AM FAMILIAR WITH RELOCATION FEES CHARGED</p> <p>4 OVER THE YEARS. AND AGAIN, I DON'T KNOW HOW ALL</p> <p>5 OF THEM WERE DETERMINED, BUT FOR INSTANCE, IN</p> <p>6 NEW JERSEY'S CASE, WHEN THE DEVILS RELOCATED</p> <p>7 FROM DENVER TO NEW JERSEY, I BELIEVE THEY ENDED</p> <p>8 UP PAYING A RELOCATION FEE TO THE LEAGUE WHICH</p> <p>9 WAS DISTRIBUTED TO EACH OF THE FLYERS, ISLANDERS</p> <p>10 AND RANGERS AS A FORM OF INDEMNIFICATION FOR</p> <p>11 THEIR MARKETPLACES. THEY PAID A SEPARATE FEE TO</p> <p>12 THE RANGERS FOR INDEMNIFICATION, AND THEY PAID</p> <p>13 TWO OTHER FEES TO THE ISLANDERS AND</p> <p>14 PHILADELPHIA. THEY ENDED UP PAYING</p> <p>15 \$19.1 MILLION IN RELOCATION, INDEMNIFICATION</p> <p>16 FEES IN THE CONTEXT OF A TRANSACTION WHERE THEY</p> <p>17 PURCHASED THE CLUB FOR \$8 MILLION.</p> <p>18 Q THIS WAS IN 1982?</p> <p>19 A CORRECT.</p> <p>20 Q NOW, YOU HAVE NO PERSONAL KNOWLEDGE OF</p> <p>21 THIS, RIGHT?</p> <p>22 A NO. ONLY WHAT I'VE READ.</p> <p>23 Q NOW, IN 1982, IS IT TRUE, IF YOU'VE</p> <p>24 LEARNED THIS THROUGH YOUR STUDY, THAT AT THAT</p> <p>25 TIME THE LEAGUE'S POSITION WAS THAT EACH TEAM</p>	<p>1 WILLIAM DALY</p> <p>2 HAD AN ABSOLUTE TERRITORIAL VETO OVER ITS OWN</p> <p>3 MARKET?</p> <p>4 A I BELIEVE THAT WAS THE LEAGUE'S</p> <p>5 POSITION, YES.</p> <p>6 Q SO THAT EVERY ONE OF THOSE TEAMS, THE</p> <p>7 RANGERS, THE FLYERS, THE ISLANDERS HAD AN</p> <p>8 ABSOLUTE RIGHT TO KEEP THE DEVILS OUT IF THEY</p> <p>9 WANTED TO?</p> <p>10 A NO, THAT'S NOT CORRECT</p> <p>11 Q WHY NOT?</p> <p>12 A NEITHER -- WELL, LAST TIME I CHECKED,</p> <p>13 THE MEADOWLANDS WASN'T WITHIN 50 MILES OF</p> <p>14 PHILADELPHIA, NOR WAS IT WITHIN 50 MILES OF</p> <p>15 UNIONDALE.</p> <p>16 Q IT WAS WITHIN 50 MILES OF THE RANGERS?</p> <p>17 A CORRECT. FIVE MILES, ACTUALLY.</p> <p>18 Q SO THE RANGERS HAD AN ABSOLUTE RIGHT?</p> <p>19 A I BELIEVE THAT WAS THE COURT'S</p> <p>20 INTERPRETATION, YES.</p> <p>21 Q WHEN YOU SAY THE LEAGUE IMPOSED A</p> <p>22 RELOCATION AND DISTRIBUTED, THE LEAGUE DIDN'T</p> <p>23 KEEP ANY OF THE MONEY FROM THE RELOCATION FEE,</p> <p>24 DID IT? IT WAS GIVEN OUT TO THE THREE TEAMS,</p> <p>25 THE RANGERS, THE ISLANDERS AND THE --</p>
Page 208	Page 209
<p>1 WILLIAM DALY</p> <p>2 PHILADELPHIA, CORRECT?</p> <p>3 A YES, THAT'S MY UNDERSTANDING</p> <p>4 Q AND IT'S TRUE, ISN'T IT, THAT THAT WAS</p> <p>5 A PRODUCT A NEGOTIATION IN WHICH ALL THREE TEAMS</p> <p>6 AND THE LEAGUE AND MR. MCMULLEN ALL PARTICIPATED</p> <p>7 IN TOGETHER, RIGHT?</p> <p>8 A I BELIEVE THAT'S CORRECT, ALTHOUGH,</p> <p>9 AGAIN, THERE WERE STANDARDS EMPLOYED. FOR</p> <p>10 INSTANCE, ONE MEASURE OF WHAT THE DEVILS HAD TO</p> <p>11 PAY THE ISLANDERS AND FLYERS, AS I UNDERSTAND</p> <p>12 IT, WAS 50 PERCENT OF THE ELECTRONIC MEDIA</p> <p>13 RIGHTS THAT THEY COLLECTED IN THEIR MARKET,</p> <p>14 BECAUSE IT WAS A DILUTION OF THE ELECTRONIC</p> <p>15 MEDIA RIGHTS THAT MIGHT BE AVAILABLE TO THE</p> <p>16 OTHER CLUBS.</p> <p>17 Q HOW DO YOU KNOW THAT?</p> <p>18 A BASED ON BOARD MINUTES.</p> <p>19 Q FROM 1982?</p> <p>20 A YES WE HAVE BOARD MINUTES GOING BACK</p> <p>21 -- WE HAVE 92 YEARS OF HISTORY IN THE NATIONAL</p> <p>22 HOCKEY LEAGUE. WE HAVE BOARD MINUTES THAT GO</p> <p>23 BACK A LONG WAY.</p> <p>24 MR. KESSLER: MY REQUEST WOULD BE THAT</p> <p>25 IF THE LEAGUE INTENDS IN ANY BRIEF,</p>	<p>1 WILLIAM DALY</p> <p>2 ARGUMENT, SUBMISSION TO IN ANY WAY RELY UPON</p> <p>3 THE EVENTS OF 1982, SINCE WE DON'T HAVE A</p> <p>4 WITNESS WITH PERSONAL KNOWLEDGE OF THAT,</p> <p>5 THAT WE WOULD REQUEST THAT SUCH BOARD</p> <p>6 MINUTES OR ANY OTHER MATERIALS RELATING TO</p> <p>7 THAT THAT YOU HAVE AVAILABLE BE PRODUCED.</p> <p>8 IF YOU'RE NOT GOING TO RELY ON IT --</p> <p>9 MR. GOLDFEIN: IF WE'RE GOING TO RELY</p> <p>10 ON THEM, I'M SURE THAT INFORMATION WILL BE</p> <p>11 MADE AVAILABLE TO YOU.</p> <p>12 MR. KESSLER: THAT WOULD BE MY</p> <p>13 REQUEST.</p> <p>14 MR. SORENSEN: GOOD TIME FOR A BREAK?</p> <p>15 MR. KESSLER: SURE.</p> <p>16 (WHEREUPON, A BREAK WAS TAKEN.)</p> <p>17 BY MR. KESSLER:</p> <p>18 Q BACK TO THE DALY EXHIBIT 10, THE</p> <p>19 SECOND PAGE, THIS IS TALKING ABOUT THE COLORADO</p> <p>20 MOVE TO NEW JERSEY. AND YOU'RE TALKING -- IN</p> <p>21 YOUR ANSWER, AT LEAST, YOU'RE SAYING THERE WERE</p> <p>22 DIFFERENT ELEMENTS OF INDEMNITY THERE WAS A</p> <p>23 TERRITORIAL INDEMNIFICATION FOR THE RANGERS AND</p> <p>24 THERE WAS A TELEVISION TERRITORY INDEMNIFICATION</p> <p>25 FOR THE ISLANDERS AND FLYERS. I WANT TO</p>

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<p>1 WILLIAM DALY</p> <p>2 2009 WAS MARKED AS DALY EXHIBIT 11 FOR</p> <p>3 IDENTIFICATION, AS OF THIS DATE.)</p> <p>4 BY MR. KESSLER:</p> <p>5 Q MR. DALY, IF YOU TAKE A LOOK AT THIS.</p> <p>6 THIS DESCRIBES CERTAIN COMMENTS TO YOU ON</p> <p>7 MAY 7TH, 2009. AND I'LL GO FIRST TO THE SECOND</p> <p>8 PARAGRAPH. IT SAYS -- THE THIRD PARAGRAPH. IT</p> <p>9 SAYS, "MR. BALSILLIE IS ACTING AGAIN IN TOTAL</p> <p>10 DISREGARD OF ANY RULES OR ANY STRUCTURE. I'D BE</p> <p>11 VERY SURPRISED IF THE BOARD WOULD LOOK FAVORABLY</p> <p>12 ON THE WAY THAT MR. BALSILLIE HAS CONDUCTED</p> <p>13 HIMSELF IN THIS INSTANCE."</p> <p>14 DID YOU MAKE THAT COMMENT?</p> <p>15 A YES, I DID.</p> <p>16 Q THE NEXT PAGE IS A QUOTATION</p> <p>17 ATTRIBUTED TO YOU. "HE MAKES HIS OWN DECISIONS,</p> <p>18 AND HE'S MAKING A DECISION THAT THIS IS THE WAY</p> <p>19 HE WANTS TO GET INTO THE NATIONAL HOCKEY LEAGUE.</p> <p>20 WE DON'T USUALLY LIKE TO PICK FIGHTS, BUT WE END</p> <p>21 THEM."</p> <p>22 DID YOU MAKE THAT COMMENT?</p> <p>23 A WHERE ARE WE?</p> <p>24 Q THE VERY TOP OF PAGE 2.</p> <p>25 A YES. AND I DID MAKE THAT COMMENT.</p>	<p>1 WILLIAM DALY</p> <p>2 Q AND THEN THERE'S A THIRD COMMENT RIGHT</p> <p>3 AFTER THAT. "WELL, CERTAINLY TO THE EXTENT HE'S</p> <p>4 ATTACKED VIRTUALLY EVERY RULE THAT'S IN</p> <p>5 EXISTENCE IN THE NATIONAL HOCKEY LEAGUE, I DON'T</p> <p>6 THINK THE GOVERNORS WILL LOOK KINDLY TO THE</p> <p>7 POSTURE HE'S TAKING IN THIS PROCEEDING, THAT'S</p> <p>8 FOR SURE."</p> <p>9 DID YOU MAKE THAT COMMENT?</p> <p>10 A YES.</p> <p>11 Q AND ONE MORE AFTER THAT. IT SAYS,</p> <p>12 "ASKED WHAT THE LEAGUE'S BIGGEST OBJECTION TO</p> <p>13 THE BALSILLIE BID IS, DALY REPLIED, "WELL, HE'S</p> <p>14 DOING IT TOTALLY IN DISREGARD OF OUR RULES."</p> <p>15 DID YOU MAKE THAT COMMENT?</p> <p>16 A YES.</p> <p>17 Q THEN ON THE TOP OF 3 OF THIS PAGE, YOU</p> <p>18 MADE A COMMENT. THIS IS WHERE YOU WERE ASKED A</p> <p>19 QUESTION APPARENTLY ABOUT WHETHER YOU COULD</p> <p>20 ENVISION A TIME -- IT STARTS ON THE PREVIOUS</p> <p>21 PAGE -- WHEN THERE WOULD BE A SECOND TEAM IN</p> <p>22 SOUTHERN ONTARIO, AND THEN YOUR COMMENT ON THE</p> <p>23 NEXT PAGE IS, "BUT RIGHT NOW WE'RE FOCUSED ON</p> <p>24 THE 30 TEAMS WE HAVE IN THE 30 MARKETS WE'RE IN.</p> <p>25 WE'RE NOT PLANNING ON EXPANDING AT ANY TIME IN</p>
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<p>1 WILLIAM DALY</p> <p>2 THE FORESEEABLE FUTURE, AND WE'RE NOT FOCUSED ON</p> <p>3 ANY CLUB RELOCATION."</p> <p>4 DID YOU MAKE THOSE COMMENTS?</p> <p>5 A YES.</p> <p>6 Q WERE THOSE TRUTHFUL COMMENTS WHEN YOU</p> <p>7 MADE THEM?</p> <p>8 A YES.</p> <p>9 Q THAT TAKES CARE OF THAT ONE.</p> <p>10 ARE YOU FAMILIAR, MR. DALY, AT ALL --</p> <p>11 THIS IS PRE YOUR TIME AT THE LEAGUE, BUT YOU</p> <p>12 SEEM TO HAVE EXAMINED OTHER THINGS PRE YOUR TIME</p> <p>13 AT THE LEAGUE, SO I'LL ASK YOU. WOULD THE</p> <p>14 COMPLAINTS THAT PETER POCKLINGTON MAY HAVE MADE</p> <p>15 IN 1992-'93 TO THE CANADIAN BUREAU OF</p> <p>16 COMPETITION WHILE HE WAS AN NHL OWNER ABOUT THE</p> <p>17 LEGALITY OF THE NHL'S RULES ON RELOCATION?</p> <p>18 A NO.</p> <p>19 Q YOU DO RECALL MR. POCKLINGTON WAS AN</p> <p>20 OWNER OF THE EDMONTON OILERS?</p> <p>21 A I DO.</p> <p>22 Q MR. DALY, ARE YOU FAMILIAR OR DID YOU</p> <p>23 SEE THE VARIOUS KROLL REPORTS THAT WERE PREPARED</p> <p>24 ON MR. BALSILLIE?</p> <p>25 A I'M FAMILIAR WITH THEM.</p>	<p>1 WILLIAM DALY</p> <p>2 Q HAVE YOU SEEN THEM?</p> <p>3 A I'VE SEEN THEM PHYSICALLY, BUT I CAN'T</p> <p>4 TELL YOU -- OTHER THAN POTENTIALLY SKIMMING</p> <p>5 THEM, I DIDN'T READ THEM IN ANY GREAT DETAIL.</p> <p>6 Q DO YOU KNOW WHY THERE ARE DIFFERENT</p> <p>7 VERSIONS OF THE REPORT PREPARED, ONE ON</p> <p>8 JUNE 15th, WHICH WAS OF JAMES BALSILLIE AND</p> <p>9 HEIDI BALSILLIE, AND THEN ONE ON JULY 23rd,</p> <p>10 WHICH IS JUST OF JAMES BALSILLIE, AND YET</p> <p>11 ANOTHER ONE ON JULY 21st, WHICH WAS A SEPARATE</p> <p>12 MEMORANDUM TO MR. ZIMMERMAN? DO YOU HAVE AN</p> <p>13 UNDERSTANDING OF WHY THERE ARE THESE DIFFERENT</p> <p>14 VERSIONS FLOATING AROUND?</p> <p>15 A NO.</p> <p>16 MR. GOLDFEIN: OBJECTION TO THE FORM</p> <p>17 OF THE QUESTION.</p> <p>18 BY MR. KESSLER:</p> <p>19 Q WERE YOU INVOLVED IN ANY DISCUSSIONS</p> <p>20 ABOUT TAKING MATERIALS IN THE KROLL REPORT OUT</p> <p>21 OR INCLUDING SOME MATERIALS IN THE KROLL REPORT?</p> <p>22 A NO</p> <p>23 Q DO YOU KNOW WHY THE KROLL REPORTS WERE</p> <p>24 NOT GIVEN TO THE EXECUTIVE COMMITTEE OR TO THE</p> <p>25 BOARD OF GOVERNORS BEFORE MAKING THEIR DECISION</p>

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24 JULY 2, 2009  
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1 ERRATA SHEET  
2 NAME OF CASE: DEWEY RANCH HOCKEY  
3 DATE OF DEPOSITION: AUGUST 21, 2009  
4 NAME OF WITNESS: WILLIAM DALY  
5  
6 REASON CODES:  
7 1. TO CLARIFY THE RECORD.  
8 2. TO CONFORM TO THE FACTS  
9 3. TO CORRECT THE TRANSCRIPTION  
10 ERRORS.  
11 PAGE \_\_\_\_\_ LINE \_\_\_\_\_ REASON \_\_\_\_\_  
12 FROM \_\_\_\_\_ TO \_\_\_\_\_  
13 PAGE \_\_\_\_\_ LINE \_\_\_\_\_ REASON \_\_\_\_\_  
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25 WILLIAM DALY

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WILLIAM DALY - HIGHLY CONFIDENTIAL

MR. BRANDON: NO QUESTIONS, THANKS.

MR. SALA: NO QUESTIONS.

(TIME NOTED 3:49 P.M.)

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WILLIAM DALY

SUBSCRIBED AND SWORN TO BEFORE ME

THIS                      DAY OF                      , 2009

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