

EXHIBIT "2"

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Attorneys for Jerry Moyes

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF ARIZONA

In re:

DEWEY RANCH HOCKEY, LLC

COYOTES HOLDINGS, LLC

COYOTES HOCKET, LLC and

ARENA MANAGEMENT GROUP,
LLC,

Debtors

Chapter 11 Proceedings

Case No. 2:09-bk-09488-RTBP

(Jointly Administered)

**DECLARATION OF STEVE ROMAN
REGARDING RESPONSE TO CITY OF
GLENDALE'S APPLICATION FOR
ORDER TO SHOW CAUSE**

Hearing Date: TBD

Time: TBD

Steve Roman, under penalty of perjury, states:

1. I am partner with the firm FirstStrategic, LLC. I am over that age of 18 and am a resident of the State of Arizona. The matters contained in this declaration are of my own knowledge.

2. FirstStrategic is a public relations consultant to Jerry Moyes and the Debtors in the Coyotes Hockey Bankruptcy proceedings.

3. In that capacity, I received a call from Rebekah Sanders shortly before 5:00

1 PM on Friday, July 31, 2009. Ms. Sanders is a reporter for the Arizona Republic
2 newspaper. In that conversation, Ms. Sanders informed me that she had just retrieved a
3 document from the Bankruptcy Court's docket which described some of the proposed
4 financial terms between the City of Glendale and the Reinsdorf Group. I later learned
5 that this document has been referred to as "Appendix A." She was looking for additional
6 information from the Moyes/Debtors' attorneys regarding that document.

7 4. While I was speaking with Ms. Sanders, I called Tom Salerno, whom I
8 understand represents the Debtors in the Coyotes Bankruptcy. With Ms. Sanders on the
9 line, I described to Mr. Salerno the Objection to which Ms. Sanders was referring. Mr.
10 Salerno stated that he did not think it was anything his firm had filed but was likely
11 something filed by Mr. Moyes' personal attorneys, Jennings Strouss.

12 5. I then contacted Peter Sorensen, an attorney I understand represents Mr.
13 Moyes in his individual capacity as a creditor of the Coyotes. I described my call with
14 Ms. Sanders to him. When I described the document that Ms. Sanders had described to
15 me, Mr. Sorensen said, "Steve, I think I've really made a mistake here. I've got to deal
16 with it right now and I'll call you back." I did not immediately break my connection with
17 Mr. Sorensen, though it appeared that he thought I had. Just before I broke the
18 connection, I heard Mr. Sorensen sigh deeply, and I believe he said something like, "Oh,
19 s**t."

20 6. When Mr. Sorensen did not call me back, I called him again. He explained
21 to me that he had made a mistake in filing the document but that he had been able to get
22 in touch with a Bankruptcy Court Clerk who had withdrawn the document from the
23 public record.

24 7. Mr. Sorensen then told me that he needed to contact Mr. Moyes because he
25 knew nothing about the mistake. Mr. Sorensen asked me if I had Jerry Moyes' cell phone
26 number. I provided it to him.

1
2 Dated August 6, 2009.

3
4 /s/ Steve Roman
5 Steve Roman
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