

Thomas J. Salerno (AZ Bar No. 007492) [tsalerno@ssd.com](mailto:tsalerno@ssd.com)

Jordan A. Kroop (AZ Bar No. 018825) [jkroop@ssd.com](mailto:jkroop@ssd.com)

Kelly Singer (AZ Bar No. 022024) [ksinger@ssd.com](mailto:ksinger@ssd.com)

**SQUIRE, SANDERS & DEMPSEY L.L.P.**

Two Renaissance Squire, Suite 2700

40 North Central Avenue

Phoenix, Arizona 85004-4498

(602) 528-4000

Proposed Counsel to the Debtors-In-Possession

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF ARIZONA**

In re

DEWEY RANCH HOCKEY, LLC,

COYOTES HOLDINGS, LLC,

COYOTES HOCKEY, LLC, and

ARENA MANAGEMENT GROUP, LLC,

Debtors.

Case No. 2:09-bk-\_\_\_\_\_  
(Jointly Administered)

Chapter 11

**MOTION FOR AN ORDER UNDER  
BANKRUPTCY RULE 1007(c)  
GRANTING AN EXTENSION OF TIME  
TO FILE STATEMENT OF FINANCIAL  
AFFAIRS AND SCHEDULES OF  
ASSETS AND LIABILITIES**

**Date of Hearing: TBD**

**Time of Hearing: TBD**

This Filing Applies to:

- ☒ All Debtors  
☐ Specified Debtors

DEWEY RANCH HOCKEY, LLC (“**Dewey**”), COYOTES HOLDINGS, LLC (“**Coyotes Holdings**”), COYOTES HOCKEY, LLC (“**Coyotes Hockey**”), and ARENA MANAGEMENT GROUP, LLC (“**Arena Management**”, and together with Dewey, Coyotes Holdings, and Coyotes Hockey, the “**Debtors**”), debtors-in-possession in the above-captioned Chapter 11 cases (these “**Cases**”), move this Court for an **order granting the Debtors a 15-day extension of time to file their Statement of Financial Affairs and Schedules of Assets and**

**Liabilities (the “Statements and Schedules”).** This Motion seeks immediate entry of an order granting the Motion and is brought on an emergency basis on expedited notice under Local Bankruptcy Rule 9013-1(h) to avoid immediate and irreparable harm to the Debtors’ estates.

The relief requested in this Motion would **extend the time for the Debtors to file their Statements and Schedules an additional 15 days.** The basis for the relief requested in this Motion is set forth in paragraphs 7 through 9 below.

This Motion/Application is supported by the entire record before the Court, the “Declaration of Michael Nealy in Support of Chapter 11 Petitions and First Day Motions” (the “**Nealy Declaration**”) filed contemporaneously with this Motion, and by the following memorandum of points and authorities.

## **BACKGROUND**

### **Jurisdiction and Venue**

1. On May 5, 2009 (the “**Petition Date**”), the Debtors filed their voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code (the “**Bankruptcy Code**”) in the United States Bankruptcy Court for the District of Arizona (the “**Court**”).

2. The Debtors continue to operate their businesses and manage their properties as debtors-in-possession in accordance with Bankruptcy Code §§ 1107 and 1108.

3. The Court has jurisdiction over the Cases under 28 U.S.C. §§ 157 and 1334. These matters constitute core proceedings under 28 U.S.C. § 157(b)(2).

4. Dewey is an Arizona limited liability company with its principal place of business located in Yavapai County, Arizona. The remaining Debtors are affiliates of Dewey. Accordingly, venue of the Cases is proper in the District of Arizona under 28 U.S.C. §§ 1408 and 1409.

5. The statutory predicate for the relief requested in this Motion is Rule 1007(c) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”).

6. No trustee or examiner has been appointed in these Cases, nor has an official committee of unsecured creditors been established.

### **Background Facts Concerning The Debtors**

7. In support of this Motion, the Debtors incorporate by reference the statements set forth in the “Omnibus Statement of Facts in Support of Chapter 11 Petitions And First Day Motions,” filed contemporaneously with this Motion, and the Nealy Declaration.

### **RELIEF REQUESTED**

8. Under Bankruptcy Rule 1007(c), the Debtors request that the Court extend the 15-day period within which the Debtors must file their Statements and Schedules for an additional 15 days, thus making the Statements and Schedules due on June 4, 2009.

### **BASIS FOR RELIEF**

9. Under Bankruptcy Rule 1007(c), the Debtors are required to file their Statements and Schedules within 15 days after the Petition Date. To prepare the Statements and Schedules, the Debtors must gather information from books, records, and documents relating to thousands of transactions. The collection of the information necessary to complete the Statements and Schedules will require an expenditure of substantial time and effort on the part of the Debtors’ employees. Nealy Declaration.

10. In the weeks leading up to the filing of these Cases, the Debtors’ key management team has been entirely occupied in pursuing and formulating strategic alternatives, as well as preparing information necessary for the filing of these Cases. In the early days of these Cases, the Debtors anticipate that their key management and other employees will have many

competing demands assisting in efforts to implement the Debtors' sale of assets while also addressing myriad employee, vendor and customer issues. Under these circumstances, it appears unlikely that the Debtors will be able to complete their Statements and Schedules properly and accurately by the ordinary 15-day deadline. Nealy Declaration.

11. The relief requested is appropriate under the circumstances and is similar to relief granted in other Chapter 11 cases within this district. *See generally In re PFP Holdings, Inc.*, No. 08-00899, Docket No. 60 (Bankr. D. Ariz. Feb. 8, 2008); *In re Radical Bunny, LLC*, No. 08-13884, Docket No. 68 (Bankr. D. Ariz. Nov. 12, 2008).

WHEREFORE, the Debtors respectfully request that the Court enter an Order, substantially in the form attached to this Motion: (a) granting the Debtors an additional 15 days to file their Statements and Schedules which will set the deadline to file at 30 days after the Petition Date; and (b) granting such other and further relief as may be just and proper.

Dated this 5<sup>th</sup> day of May, 2009.

**SQUIRE, SANDERS & DEMPSEY L.L.P.**

By: /s/ Thomas J. Salerno  
Thomas J. Salerno  
Jordan A. Kroop  
Kelly Singer  
Two Renaissance Square  
40 North Central Avenue, Suite 2700  
Phoenix, Arizona 85004-4498  
(602) 528-4000

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