Thomas J. Salerno (AZ Bar No. 007492) <u>tsalerno@ssd.com</u> Jordan A. Kroop (AZ Bar No. 018825) <u>jkroop@ssd.com</u> Kelly Singer (AZ Bar No. 022024) <u>ksinger@ssd.com</u> **SQUIRE, SANDERS & DEMPSEY L.L.P.** Two Renaissance Squire, Suite 2700 40 North Central Avenue Phoenix, Arizona 85004-4498 (602) 528-4000

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-09488 (Jointly Administered)

Chapter 11

SUPPLEMENTAL DISCLOSURE REGARDING VERIFIED STATEMENT OF THOMAS J. SALERNO IN SUPPORT OF APPLICATION FOR AN ORDER UNDER 11 U.S.C. § 327(a) AUTHORIZING THE RETENTION AND EMPLOYMENT OF SQUIRE, SANDERS & DEMPSEY L.L.P. AS ATTORNEYS FOR THE DEBTORS

Date of Hearing: N/A Time of Hearing: N/A

This Filing Applies to: All Debtors Specified Debtors

Thomas J. Salerno, under penalty of perjury, states:

1. I am a partner in the firm of Squire, Sanders & Dempsey L.L.P. ("Squire Sanders"), which maintains an office for the practice of law at Two Renaissance Square, 40 North Central Avenue, Suite 2700, Phoenix, Arizona 85004. I submit this Supplement to the "Verified Statement Of Thomas J. Salerno In Support Of Application For An Order Under 11

<u>U.S.C.</u> § 327(a) Authorizing The Retention And Employment Of Squire, Sanders & Dempsey, <u>LLP As Attorneys For The Debtors</u>" [Docket No. 15] (the "**Verified Statement**").¹ Except as otherwise indicated, I have personal knowledge of the matters set forth below and, if called as a witness, to testify to such matters, I would do so completely.²

SUPPLEMENTAL DISCLOSURE

2. The Debtors have engaged Bryan Cave LLP ("**Bryan Cave**") as "Conflicts Counsel" to the extent adverse action is required in these Cases with respect to the following persons or entities: Jerry and Vicki Moyes; The Jerry and Vickie Moyes Family Trust; U.S. Bank Corp; Coyotes Center Development LLC; Ellman Companies; Sub Investments, LLC; Westgate Investments, LLC; and Glendale – 101 Development, LLC.

3. After further investigation, I have been informed that Squire Sanders represents ARAMARK Sports & Entertainment, Inc. ("ARAMARK"), with respect to the routine maintenance of a liquor license owed by ARAMARK, which it currently utilizes at the Jobing.com Arena. Squire Sanders also represents ARAMARK with respect to other unrelated liquor licenses. Although Squire Sanders does not believe its services to the Debtors are directly adverse to ARAMARK's liquor license it owns and uses at the Jobing.com Arena, out of an abundance of caution, Squire Sanders is working with Bryan Cave to handle any matters on behalf of the Debtors that involve ARAMARK. In this regard, Bryan Cave is currently conducting its own conflict check to determine if it is capable of representing ARAMARK.

Dated this 11th day of August, 2009.

/s/ Thomas J. Salerno Thomas J. Salerno

¹ Capitalized terms not defined in this Supplement have the meaning ascribed to them in the Verified Statement.

² Certain statements in this Verified Statement relate to matters within the knowledge of other attorneys at Squire Sanders and are based on information they provided to me.