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**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

**NOTICE OF DEPOSITIONS SOUGHT
BY DEBTORS AND REASONS
THEREFORE**

and

**JOINDER IN PSE SPORTS &
ENTERTAINMENT'S POSITION ON
RELOCATION AND OWNERSHIP
TRANSFER DISCOVERY**

This Filing Applies to:

- All Debtors
- Specified Debtors

Debtors, in accordance with the Court's instructions in open court on August 11, 2009, hereby provide notice of those depositions they seek related to the Motion of National Hockey League for a Determination that Debtors' NHL Membership Rights May Not Be Transferred to PSE or an Affiliate Thereof (Docket #584), and the reasons therefore. With respect to document

requests to the NHL regarding this motion, Debtors join in PSE Sports & Entertainment's Position on Relocation and Ownership Transfer Discovery.

William Daly: Mr. Daly is a declarant who signed a declaration dated August 2, 2009. He also is the Assistant Commissioner of the NHL who filed a declaration after the Board of Governors (the "Board") voted to deny PSE Sports & Entertainment LP's ("PSE's") and James Balsillie's transfer application. (Docket #544). Debtors intend to question Mr. Daly regarding the substance of his declaration, the process by which the Board came to this conclusion, and other associated matters raised by the NHL's motions.

Craig Leipold: Mr. Leipold is a declarant who signed a declaration dated August 7, 2009. He also is the majority owner of the NHL's Minnesota Wild, and former majority owner of the Nashville Predators, who filed an extensive declaration (Docket #585) in conjunction with the NHL's motion regarding its denial of PSE and James Balsillie's transfer application. Debtors intend to question Mr. Leipold regarding the substance of his declaration, his statements made to the executive board of the NHL as reflected in the NHL's July 29, 2009 report regarding the information considered with respect to PSE and Mr. Balsillie's transfer application, as well as any additional personal knowledge he has related to the consideration of the transfer application by the NHL's executive board and board of governors, and other associated matters raised by the NHL's motions.

Jeremy Jacobs: Mr. Jacobs is a declarant who signed a declaration dated August 7, 2009. He also is the majority owner of the NHL's Boston Bruins who filed an extensive declaration (Docket #586) in conjunction with the NHL's motion regarding its denial of PSE and James Balsillie's transfer application. Mr. Jacobs is also the Chairman of the NHL's Board of Governors. Debtors intend to question Mr. Jacobs regarding the substance of his declaration, his

presence and recollections of the executive committee meeting he attended where Mr. Balsillie was interviewed, as well as any additional information he has related to the consideration of the transfer application by the NHL's executive board and board of governors, and other associated matters raised by the NHL's motions.

Gary Bettman: Mr. Bettman is the Commissioner of the NHL. In open court on August 11, 2009, the NHL represented that Mr. Bettman was available to testify as to the reasons the Coyotes could not relocate for the 2009-2010 season. Mr. Bettman was also involved in the process by which the NHL denied PSE and Mr. Balsillie's transfer application. Debtors seek to depose Mr. Bettman regarding his personal knowledge supporting the NHL's position that the Coyotes cannot be relocated for the 2009-2010 season, the process by which PSE and Mr. Balsillie's transfer application was considered and denied, and other associated matters raised by the NHL's motions.

Richard Peddie: Mr. Peddie is the owner of the Toronto Maple Leafs. He has been quoted as saying that he/the Toronto Maple Leafs would not allow the NHL to move an existing team or an expansion team into the exclusive territory of the Maple Leafs. Debtors seek to depose Mr. Peddie as to his involvement in the process by which PSE and Mr. Balsillie's transfer application was denied, the discussions he had with other NHL member teams and/or NHL representatives regarding PSE and Mr. Balsillie's transfer application, any attempts by Mr. Peddie or the Toronto Maple Leafs to exercise the veto rights teams have accorded to them through the NHL By-Laws and Constitution regarding a team moving into the exclusive territory of another team, and other associated matters raised by the NHL's motions.

An unknown individual who the NHL has stated will issue a declaration regarding the purported impossibility of relocating the Coyotes for the 2009-2010 season: On August 11,

2009, during the meet and confer ordered by the Court, the NHL's counsel, Shepard Goldfein, stated that the NHL would provide documents related to the purported impossibility to relocate the Coyotes for the 2009-2010 season as well as a declaration of a currently undisclosed person in support of its motion to be filed on August 18, 2009. Mr. Goldfein stated that the NHL would object to any discovery beyond those documents, the declaration, and a deposition of the individual providing the declaration would be provided by the NHL. Debtors seek to depose that declaration as to the substance of the declaration as well as regarding information related to the NHL's support for its claim that the Coyotes cannot be relocated for the 2009-2010 season, and other associated matters raised by the NHL's motions.

RESPECTFULLY SUBMITTED this 12th day of August, 2009.

SQUIRE, SANDERS & DEMPSEY L.L.P.

By: /s/ Thomas J. Salerno

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