

C. Taylor Ashworth, 010143
Alan A. Meda, 009213
STINSON MORRISON HECKER LLP
1850 North Central Avenue, Suite 2100
Phoenix, Arizona 85004
Telephone: (602) 279-1600
Facsimile: (602) 240-6925
tashworth@stinson.com
ameda@stinson.com
J. Gregory Milmo
Shepard Goldfein
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
4 Times Square
New York, New York 10036
Telephone: (212) 735-3000
Facsimile: (212) 735-2000
gregory.milmo@skadden.com
shepard.goldfein@skadden.com
Anthony W. Clark
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
One Rodney Square
Wilmington, Delaware 19899
Telephone: (302) 651.3000
Facsimile: (302) 651.3001
anthony.clark@skadden.com

Attorneys for the National Hockey League

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA**

In re
DEWEY RANCH HOCKEY, LLC,
COYOTES HOLDINGS, LLC,
COYOTES HOCKEY, LLC, and
ARENA MANAGEMENT GROUP,
LLC,
Debtors.

Chapter 11

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

**MOTION TO EXCEED PAGE LIMITATION RE
NATIONAL HOCKEY LEAGUE'S OMNIBUS BRIEF
OBJECTING TO RELOCATION OF THE COYOTES
AND RESPONDING TO PSE'S AND DEBTORS'
BRIEFS REGARDING RELOCATION AND
RELOCATION FEES**

This filing applies to:

- § All Debtors
- Specified Debtors

The National Hockey League ("NHL" or the "League"), through counsel, hereby requests entry of an Order authorizing it to exceed the page limitation of Local Bankruptcy Rule 9013-1(b) and/or the Rules of Practice of the United States District Court for the District of Arizona Local R. Civ. P. 7.2(e) (the "Local Rules") relative to the National Hockey League's Omnibus Brief Objecting To Relocation

1 Of The Coyotes And Responding To PSE's And Debtors' Briefs Regarding Relocation and Relocation
2 Fees ("NHL Objection") to be filed on September 4, 2009.

3 The NHL Objection requires a lengthy detailed discussion of the NHL's consent rights, the
4 NHL governing documents, relocation of an NHL member team and the determination of a relocation
5 fee. The League does not believe it can properly provide the Court with the necessary background and
6 information within the page limitations of the Local Rules. As such, request is made to exceed the
7 page limitations set out in the Local Rules to permit the filing of the NHL Objection in its entire
8 length.

9 WHEREFORE, the NHL requests entry of an Order authorizing it to exceed the page limitation
10 of the Local Rules applicable to the NHL Objection and granting such other relief as is just in the
11 circumstances.

12 RESPECTFULLY SUBMITTED this September 4, 2009.

13 **STINSON MORRISON HECKER LLP**

14 By: /s/ Alan A. Meda (#009213)

15 C. Taylor Ashworth
16 Alan A. Meda

17 and

18 J. Gregory Milmo
19 Shepard Goldfein
20 Anthony W. Clark
21 SKADDEN ARPS SLATE MEAGHER &
22 FLOM LLP
23 Attorneys for National Hockey League

24 COPY of the foregoing sent this September 4,
25 2009, to:

26 Thomas J. Salerno, Esq.
27 Jordan A. Kroop, Esq.
28 Kelly Singer, Esq.
SQUIRE SANDERS & DEMPSEY LLP
40 N Central Ave #2700
Phoenix AZ 85004-4498
tsalerno@ssd.com
jkroop@ssd.com
ksinger@ssd.com

James E. Cross, Esq.
Brenda K. Martin, Esq.
Warren J. Stapleton, Esq.
OSBORN MALEDON PA
2929 N Central Ave #2100
Phoenix AZ 85012-2794
jcross@omlaw.com
bmartin@omlaw.com
wstapleton@omlaw.com
Attorneys for National Hockey League Players'

Attorneys for Debtors

Larry L. Watson, Esq.
Connie S. Hoover
OFFICE OF THE U.S. TRUSTEE
230 N First Ave #204
Phoenix AZ 85003-1706
larry.watson@usdoj.gov
connie.s.hoover@usdoj.gov

Susan M. Freeman, Esq.
Stefan M. Palys, Esq.
LEWIS AND ROCA LLP
40 N Central Ave
Phoenix AZ 85004-4429
SFreeman@lrlaw.com
spalys@lrlaw.com
Attorneys for PSE Sports & Entertainment and
for S&E Interim Facility Corporation

Steven M. Abramowitz, Esq.
VINSON & ELKINS LLP
666 Fifth Ave 26th Fl
New York NY 10103-0040
sabramowitz@velaw.com
Attorneys for SOF Investments LP, White Tip
Investments, LLC, and Donatello Investments,
LLC

Donald L. Gaffney, Esq.
SNELL & WILMER LLP
One Arizona Center
Phoenix AZ 85004-2202
dgaffney@swlaw.com
Attorneys for SOF Investments LP, White Tip
Investments, LLC, and Donatello Investments,
LLC

Richard H. Herold, Esq.
HINSHAW & CULBERTSON LLP
3200 N Central Ave #800
Phoenix AZ 85012
rherold@hinshawlaw.com
Attorneys for Aramark

Ivan L. Kallick, Esq.
Ileana M. Hernandez, Esq.
MANATT PHELPS & PHILLIPS
11355 W Olympic Blvd
Los Angeles CA 90064
ikallick@manatt.com

Association

Carolyn J. Johnsen, Esq.
Peter W. Sorensen, Esq.
JENNINGS STROUSS & SALMON PLC
201 E Washington St
Phoenix AZ 85004-2385
cjohnsen@jsslaw.com
psorensen@jsslaw.com
Attorneys for Jerry Moyes

Jeffrey Freund, Esq.
BREDHOFF & KAISER PLLC
805 15th St NW
Washington DC 20005
jfreund@bredhoff.com
Attorneys for National Hockey League Players'
Association

Sean P. O'Brien, Esq.
GUST ROSENFELD PLC
201 E Washington St #800
Phoenix AZ 85004-2327
spobriein@gustlaw.com
Attorneys for Drawbridge Special opportunities
Fund LP

Richard W. Havel, Esq.
SIDLEY AUSTIN LLP
555 W Fifth St 40th Fl
Los Angeles CA 90013-1010
rhavel@sidley.com
Attorneys for Drawbridge Special opportunities
Fund LP

Lori Lapin Jones
LORI LAPIN JONES PLLC
98 Cutter Mill Rd #201 N
Great Neck NY 11021
ljones@jonespllc.com
Attorneys for BWD Group

Thomas Allen, Esq.
Paul Sala, Esq.
ALLEN SALA & BAYNE PLC
1850 N Central Ave #1150
Phoenix AZ 85004
psala@asbazlaw.com

ihernandez@manatt.com
Attorneys for Ticketmaster

Louis T.M. Conti, Esq.
HOLLAND & KNIGHT LLP
100 N Tampa St #4100
Tampa FL 33602
louis.conti@hklaw.com
Attorneys for Facility Merchandising Inc.

Cathy L. Reece, Esq.
Nicolas B. Hoskins, Esq.
Fennemore Craig PC
3003 n Central Ave #2600
Phoenix AZ 85012-2913
creece@fclaw.com
nhoskins@fclaw.com
Attorneys for City of Glendale, Arizona

William R. Baldiga, Esq.
Andrew M. Sroka, Esq.
BROWN RUDNICK LLP
One Financial Center
Boston MA 02111
wbaldiga@brownrudnick.com
asroka@brownrudnick.com
Attorneys for City of Glendale, Arizona

Jonathan P. Ibsen, Esq.
Laura A. Rogal, Esq.
JABURG & WILK PC
3200 N Central Ave #2000
Phoenix AZ 85012-2400
jpi@jaburgwilk.com
lar@jaburgwilk.com
Attorneys for Wayne Gretzky

Scott B. Cohen, Esq.
ENGELMAN BERGER PC
3636 N Central Ave #700
Phoenix AZ 85012
sbc@engelmanberger.com
Attorneys for John Breslow

tallen@asbazlaw.com
Attorneys for the Official Joint Committee of
Unsecured Creditors

William Novotny, Esq.
MARISCAL WEEKS McINTYRE &
FRIEDLANDER PA
2901 N Central Ave #200
Phoenix AZ 85012-2705
William.novotny@mwmf.com
Attorneys for Coyote Center Development LLC

Jonathan K. Bernstein, Esq.
Andrew J. Gallo, Esq.
BINGHAM McCUTCHEN LLP
One Federal St
Boston MA 02110
Jon.bernstein@binghma.com
Andrew.gallo@bingham.com

Mark C. Dangerfield, Esq.
Dean C. Short, Esq.
GALLAGHER & KENNEDY PA
2575 E Camelback Rd
Phoenix AZ 85016-9225
mcd@gknet.com
dcs@gknet.com
Attorneys for Arizona Cardinals Football Club

Mark A. Nadeau, Esq.
Shane D. Gosdis, Esq.
Allison L. Kierman, Esq.
DLA PIPER LLP (US)
2525 E Camelback Rd #1000
Phoenix AZ 85016-4245
mark.nadeau@dlapiper.com
shane.gosdis@dlapiper.com
allison.kierman@dlapiper.com
Attorneys for Lease Group Resources, Inc.

Arthur E Rosenberg Esq
HOLLAND & KNIGHT LLP
195 Broadway
New York NY 10007-3189
arthur.rosenberg@hklaw.com
Attorneys for Facility Merchandising Inc.

1 /s/ Tracy Dunham

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28