

Thomas J. Salerno (AZ Bar No. 007492) tsalerno@ssd.com
Jordan A. Kroop (AZ Bar No. 018825) jkroop@ssd.com
Kelly Singer (AZ Bar No. 022024) 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, Debtor,	Case No. 2:-09-bk-_____ Chapter 11
In re COYOTES HOLDINGS, LLC, Debtor,	Case No. 2:-09-bk-_____ Chapter 11
In re COYOTES HOCKEY, LLC, Debtor,	Case No. 2:-09-bk-_____ Chapter 11
In re ARENA MANAGEMENT GROUP, LLC, Debtor.	Case No. 2:-09-bk-_____ Chapter 11
MOTION FOR AN ORDER AUTHORIZING AND DIRECTING JOINT ADMINISTRATION AND USE OF CONSOLIDATED CAPTION	
This Filing Applies to: <input checked="" type="checkbox"/> All Debtors <input type="checkbox"/> 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 authorizing and directing joint administration of the Debtors’ bankruptcy proceedings and use of a consolidated caption**. 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 **authorize the Debtors to jointly administer their bankruptcy proceedings** as the entities are affiliated entities with proceedings pending in the same court. This is not a motion for substantive consolidation of the Debtors. The basis for the relief requested by this Motion is set forth in paragraphs 9 through 17 below.

This Motion 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 1015 of the Federal Rule 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. By this Motion, the Debtors seek an order authorizing and directing joint administration of the Debtors’ bankruptcy proceedings and use of a consolidated caption.

BASIS FOR RELIEF

9. Under Bankruptcy Rule 1015(b), courts are authorized to jointly administer bankruptcy proceedings if the debtor entities are affiliated entities with proceedings pending in the same court. Specifically, Rule 1015(b) provides, in relevant part:

If a joint petition or two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates.

10. As described above, the Debtors consist of four affiliated entities, which are “affiliates” as that term is defined in Bankruptcy Code § 101(2). Accordingly, this Court is authorized to grant the relief requested in this Motion.

11. The Debtors share common ownership and corporate management. In addition, the Debtors are financially and administratively interdependent at an operational level. Nealy Declaration.

12. Accordingly, the Debtors believe these Cases not only may, but should, be jointly administered. Entry of an order directing joint administration of these Cases will eliminate the need for duplicative notices, applications, and orders, and thereby save considerable time and expense for the Debtors and their estates. Nealy Declaration.

13. The Debtors request that one file and one docket be maintained for all four cases, which should be the file established for the Chapter 11 case of Dewey Ranch Hockey, LLC, which is the lowest numbered case, and which docket should be the docket for the lowest numbered case.

14. The Debtors also request that, if the cases were initially assigned to different judges, the cases be transferred to the judge to whom the lowest numbered case was assigned.

15. Finally, the Debtors request that the following consolidated form of caption be utilized for all pleadings and orders in these cases:

**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

[TITLE OF PLEADING OR ORDER]

Hearing Date:
Hearing Time:

16. Joint administration of these Cases will not result in any prejudice to the Debtors' creditors or other parties in interest. In fact, joint administration serves the best interests of these bankruptcy estates since the issues pertinent to the reorganization of all of the above-listed Debtors involve common ownership, creditor, and management interests. Consequently, joint

administration will facilitate the administration process, and will ease the burden and expense of administering these estates. Nealy Declaration.

17. The relief requested in this Motion is for the joint administration of the Debtors' cases and is not a motion for substantive consolidation of the Debtors' estates.

WHEREFORE, the Debtors respectfully request that the Court enter an Order granting the relief requested in this Motion and such other relief as is just and proper.

Dated this 5th 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

Proposed Counsel to the Debtors-In-Possession

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF ARIZONA**

In re DEWEY RANCH HOCKEY, LLC, Debtor,	Case No. 2:-09-bk-_____ Chapter 11
In re COYOTES HOLDINGS, LLC, Debtor,	Case No. 2:-09-bk-_____ Chapter 11
In re COYOTES HOCKEY, LLC, Debtor,	Case No. 2:-09-bk-_____ Chapter 11
In re ARENA MANAGEMENT GROUP, LLC, Debtor,	Case No. 2:-09-bk-_____ Chapter 11
This Filing Applies to: <input checked="" type="checkbox"/> All Debtors <input type="checkbox"/> Specified Debtors	ORDER AUTHORIZING AND DIRECTING JOINT ADMINISTRATION AND USE OF CONSOLIDATED CAPTION

On the motion dated May 5, 2009 (the “**Motion**”) of the above-captioned debtors-in-possession (the “**Debtors**”) for entry of an order, under Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), authorizing the joint administration of these Cases and use of a consolidated caption, and on the “Declaration of Michael Nealy in Support of Chapter 11 Petitions and First Day Motions,” this Court finds that: (i) it has jurisdiction over the matters raised in the Motion under 28 U.S.C. §§ 157 and 1334; (ii) venue of this matter is proper under 28 U.S.C. §§ 1408 and 1409; (iii) this matter is a core proceeding under 28 U.S.C. § 157(b)(2); (iv) the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties-in-interest; (v) adequate and proper notice of the Motion and a hearing on it has been given and no other or further notice is necessary; and (vi) good and sufficient cause exists for granting the relief requested in the Motion as set forth in this Order,

IT IS ORDERED THAT:

1. The Motion is GRANTED.
2. The bankruptcy proceedings of the following entities are jointly administered by

the Court:

1. DEWEY RANCH HOCKEY, LLC
2. COYOTES HOLDINGS, LLC
3. COYOTES HOCKEY, LLC
4. ARENA MANAGEMENT GROUP, LLC

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3. The caption of the jointly-administered cases will read as follows:

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF ARIZONA**

<p>In re</p> <p>DEWEY RANCH HOCKEY, LLC,</p> <p>COYOTES HOLDINGS, LLC,</p> <p>COYOTES HOCKEY, LLC, and</p> <p>ARENA MANAGEMENT GROUP, LLC,</p> <p style="text-align: center;">Debtors.</p>	<p>Case No. 2:09-bk-_____</p> <p>(Jointly Administered)</p> <p>Chapter 11</p> <p>TITLE OF MOTION OR PLEADING</p> <p>Date of Hearing:</p> <p>Time of Hearing:</p>
<p>This Filing Applies to:</p> <p><input checked="" type="checkbox"/> All Debtors</p> <p><input type="checkbox"/> Specified Debtors</p>	

4. One file and one docket will be maintained for both of the jointly-administered cases, which file will be the file established for the Chapter 11 case of DEWEY RANCH HOCKEY, LLC, which is the lowest numbered case and which docket will be the docket for the lowest numbered case.

5. A docket entry will be made on the docket for the other cases substantially as follows:

“An order has been entered in this case directing the procedural consolidation and joint administration of the Chapter 11 cases of DEWEY RANCH HOCKEY, LLC, and its affiliates. Accordingly, the docket in Case No. 09-_____ should be consulted for all matters affecting this case.”

6. If the jointly-administered cases were initially assigned to different judges, both cases are to be transferred to the judge with the lowest numbered case.

7. The consolidation of these Cases is for administrative purposes only and is not a substantive consolidation of the Debtors' Chapter 11 estates.

8. The Debtors are authorized to take all actions necessary to implement the relief granted by this Order.

DATED AND SIGNED ABOVE