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10 **UNITED STATES BANKRUPTCY COURT**

11 **DISTRICT OF ARIZONA**

12 In re:

13 DEWEY RANCH HOCKEY, LLC; COYOTES
HOLDINGS, LLC; COYOTES HOCKEY, LLC;
and ARENA MANAGEMENT GROUP, LLC,

14 Debtors.

No. 2-09-bk-09488-RTB

CHAPTER 11

(Jointly Administered)

15 **STATEMENT OF POSITION OF THE
NATIONAL FOOTBALL LEAGUE**

16 This filing applies to:

17 All Debtors
 Specified Debtors

DATE: May 19, 2009

TIME: 1:30 p.m.

LOCATION: 230 North First Avenue

Phoenix, Arizona

Courtroom 703, 7th Floor

19 The National Football League ("NFL" or "League") hereby files this Statement of
20 Position in support of the Limited Objection of The National Hockey League to Motion of the Debtors
21 for Entry of an Order (A) Authorizing Conduct of an Auction of Coyotes Hockey, LLC's Assets; (B)
22 Establishing Procedures to be Employed in Connection with the Sale Including Approval of Termination
23 Fee; and (C) Approving Form of Order and Manner of Notice of Conditional Cure Notice and
24 Solicitation Notice [Docket No. 92], and respectfully represents as follows:

25 The ability to determine its members and where its teams play is of fundamental
26 importance to the National Football League. Accordingly, the NFL Constitution and By-Laws prescribe

1 rules and procedures governing franchise ownership, transfer of ownership interests in NFL clubs, and
2 relocation of teams from one community to another.

3 The Constitution delegates authority for deciding these issues to the NFL Executive
4 Committee – composed of one representative from each of the thirty-two NFL member clubs. With
5 exceptions not relevant here, the NFL Constitution provides that the Executive Committee must approve
6 any sale of any interest in an NFL club. Similarly, any change in the location of a club's playing site
7 requires approval of the League membership.

8 These rules and procedures are crucial to the NFL member clubs' ability to produce the
9 collective NFL football product; they are crucial to the success of the League as a whole. The League
10 has consistently enforced these rules and procedures for many years.

11 For these reasons, the NFL respectfully submits that any franchise sales procedure
12 prescribed by the Court in this case should respect the National Hockey League's rules and procedures
13 regarding ownership transfer and relocation and not set precedent that has the potential to undermine or
14 disrupt the business of professional hockey, football and other major league sports.

15 DATED this 18th day of May, 2009.

16 COVINGTON & BURLING LLP
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18 Washington, D.C. 2004-2401

19 and

SCHIAN WALKER, P.L.C.

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21 By /s/ DALE C. SCHIAN, #010445
Dale C. Schian

22 Attorneys for the National Football League
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