

IMPACT ON COYOTES HOCKEY LLC ESTATE

CLAIMANTS	PSE BID ¹	Payment %	OTHER ²	Payment %	OTHER ²	Payment %	OTHER ²	Payment %
<u>DIP Loan Repayment</u>	\$212,500,000		\$140,000,000		\$130,000,000		\$90,000,000	
	\$11,000,000 ³	(100%)	\$17,000,000+ ⁴	(100%)	\$17,000,000+ ⁴	(100%)	\$17,000,000+ ⁴	(100%)
<u>Secured Creditors⁵</u>	\$117,000,000		\$117,000,000		\$117,000,000		\$117,000,000	
• NHL	37,000,000	(100%)	37,000,000	(100%)	37,000,000	(100%)	37,000,000	(100%)
• SOF	80,000,000	(100%)	80,000,000	(100%)	80,000,000	(95%)	80,000,000	(45%)
<u>Administrative (est)</u>	\$1,000,000 ⁶	(100%)	\$1,000,000+ ⁷	(100%)	\$1,000,000+ ⁷	(0%)	\$1,000,000+ ⁷	(0%)
<u>Unsecured Claims⁸</u>	\$132,700,000 --	(63%--	\$127,700,000	(4%)	\$127,700,000	(0%)	\$127,700,000	(0%)
• Trade/Other	625,700,000	13%)						
• Moyes	21,300,000		21,300,000		21,300,000		21,300,000	
• Glendale Rejection Claim	104,400,000		104,400,000		104,400,000		104,400,000	
	7,000,000 -- 500,000,000 ⁹		2,000,000 ¹⁰		2,000,000 ¹⁰		2,000,000 ¹⁰	
<u>Equity Interests¹¹</u>	\$213,900,000	(0%)	\$213,900,000	(0%)	\$213,900,000	(0%)	\$213,900,000	(0%)
• Coyotes Holdings (Moyes) (91.8%)								
• Minority Holders (8.2%)								

¹ Assumes the Glendale Lease is rejected.

² As the Court is aware, currently there are no other offers. For purposes of comparison: (a) a series of hypothetical all cash bids of \$140 (based on offer from Max Chambers), \$130 million (an amount suggested by the press for the so-called "Reinsdorf" bid), and \$90 million (based on net amount of an offer from Garvin Profit) is used; (b) based on NHL's proposed schedule (see note 4, below); and (c) with no rejection of the Glendale Arena lease.

³ Estimate through 6/30/09 Closing Date. See Budget attached to *Debtors' Motion For Interim And Final Orders: (A) Authorizing Debtors To Obtain Post-Petition Financing; (B) Authorizing Use Of Cash Collateral; And (C) Determining Sufficiency of Adequate Protection* filed May 5, 2009 (Dkt 21), as well as the *Declaration Of Michael Neely In Support Of DIP Motion* dated May 18, 2009 (Dkt 145).

⁴ Dependent on how long a sale process is involved. This figure is estimated based on a mid-September 2009 Closing Date. See *Id.*

⁵ See *Schedule of Assets And Liabilities* filed May 29, 2009 (Dkt 5), Sch. A.

⁶ Assumes Court allowance.

⁷ In addition to the amounts set forth above, PSE reserved the right to seek an administrative claim for expenses. No amount is attributable to that in this calculation.

⁸ See note 5, Sch. F.

⁹ Range based on Rejection Claim being capped pursuant to Bankruptcy Code §502(b)(6) and not being capped. Amount as per City of Glendale's counsel remarks in open Court. See Transcript of May 19, 2009 hearing at 82:5-6.

¹⁰ The City of Glendale is owed prepetition amounts based on unpaid parking fees and related claims. *Id.* note 5, Sch. F.

¹¹ See Schedule A, attached.

SCHEDULE A

Members	Capital Contribution	Equity Interest	Ownership Interest	Profits Interest	Priority Capital Interest
Coyotes Holdings, LLC	\$61,500,000	22 Class A Units 39.5 Class B Units	91.79000%	59.6635%	\$146,855,719
Wayne Gretzky	\$1,000,000	One Class A Unit	1.4923%	14.9701%	0
Lake Street Leasing Corp.	\$1,000,000	One Class A Unit	1.4923%	0.9701%	0
Jim Wilkert	\$1,000,000	One Class A Unit	1.4923%	0.9701%	0
John A. Breslow	\$1,000,000	One Class A Unit	1.4923%	0.9701%	0
John A. Breslow Rollover IRA	\$1,000,000	One Class A Unit	1.4923%	0.9701%	0
Shawn Hunter	\$500,000	One-Half Class A Unit	0.7463%	3.4851%	0
Total	\$67,000,000	100%	100%	82.0000%	
Managing Member Coyotes Holdings, LLC	0	0	0	13.0000%*	
Totals		100%		100.0000%	

*Coyotes Holdings, LLC, in its capacity as Managing Member of the Company has been granted a 35% profits interest in the Company. Pursuant to certain employment arrangements with Wayne Gretzky and Shawn Hunter, the Managing Member, and/or its predecessors, granted a 19% profits interest in the Company to Wayne Gretzky and a 3% profits interest in the Company to Shawn Hunter. Such grants were made by the Managing Member out of its 35% profits interest.