

1 Lucas M. Gjovig (SBN 10053)  
2 **DUANE MORRIS LLP**  
3 100 North City Parkway, Suite 1560  
4 Las Vegas, NV 89106  
5 Telephone: 702.868.2600  
6 Facsimile: 702.385.6862  
7 E-Mail: lmgjovig@duanemorris.com

8 Aron M. Oliner (CA SBN 152373)  
9 *Admitted Pro Hac Vice*  
10 Geoffrey A. Heaton (CA SBN 206990)  
11 *Admitted Pro Hac Vice*  
12 **DUANE MORRIS LLP**  
13 One Market Plaza  
14 Spear Street Tower, Suite 2200  
15 San Francisco, CA 94105-1127  
16 Telephone: 415.957.3000  
17 Facsimile: 415.957.3001  
18 Email: roliner@duanemorris.com  
19 gheaton@duanemorris.com

20 Attorneys for The Official Committee of  
21 Unsecured Creditors for Wild Game NG, LLC

22 **UNITED STATES BANKRUPTCY COURT**  
23 **DISTRICT OF NEVADA**  
24 **RENO DIVISION**

25 In re:  
26 HI-FIVE ENTERPRISES, LLC, a California  
27 limited liability company; ONE SOUTH LAKE  
28 STREET, LLC, a Nevada limited liability  
company; and WILD GAME NG., LLC, a  
Nevada limited liability company d/b/a The  
Siena Hotel Spa & Casino,  
Debtors and Debtors-In-  
Possession.

Case No. 10-bk-54013-GWZ

[Jointly Administered]

Chapter 11

**THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS'  
OPPOSITION TO U.S. TRUSTEE'S  
MOTION TO CONVERT CASES TO  
CHAPTER 7**

Date: February 8, 2011  
Time: 2:00 p.m.  
Place: C. Clifton Young Federal  
Building  
Courtroom #3  
300 Booth Street  
Reno, Nevada 89509

- Affects all Debtors
- Applies only to Hi-Five Enterprises, LLC
- Affects only to One South Lake Street, LLC
- Applies to Wild Game Ng, LLC

1 The Official Committee of Unsecured Creditors (“Committee”) appointed in the Wild  
2 Game Ng, LLC (“WGN”) case opposes the United States Trustee’s (“U.S. Trustee”) Motion to  
3 Convert Cases to Chapter 7 (“Motion”) and represents as follows:

4 While the points the U.S. Trustee raises in the Motion are well taken, the Committee  
5 believes that conversion of the Debtors’ cases is premature at this stage. WGN, with Court  
6 approval, has sold substantially all of its assets. However, because the closing of this sale has  
7 been delayed, WGN has been late in paying its quarterly fees to the U.S. Trustee. The Committee  
8 understands that the closing of this sale is imminent, at which time the outstanding quarterly fees  
9 will be paid. Moreover, the Committee understands that the Debtors are now up to date on their  
10 MOR filings.

11 Finally, the Debtors and Committee are considering the possibility of filing suit against  
12 certain insiders of the Debtors under various theories. Were the cases to converted now, the  
13 institutional knowledge acquired by the Debtors and Committee about these claims would be lost,  
14 and a chapter 7 trustee would be required to expend significant time and estate resources coming  
15 up to speed on these and other issues in the Debtors’ cases.

16 Accordingly, for all the foregoing reasons, the Committee opposes conversion of these  
17 cases, and requests that the Court deny the Motion. The relief sought by the U.S. Trustee may be  
18 appropriate at some point in the future, but at this time it is premature.

19  
20 DATED: January 25, 2011

**DUANE MORRIS LLP**

21  
22 By: /s/ Lucas M. Gjovig  
23 Aron M. Oliner (*Admitted Pro Hac Vice*)  
24 Geoffrey A. Heaton (*Admitted Pro Hac Vice*)  
25 Lucas M. Gjovig (SBN 10053)

26 Attorneys for The Official Committee of Unsecured  
27 Creditors for Wild Game NG, LLC

**PROOF OF SERVICE**

1. On January 25, 2011, I served the following document:

a. THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' OMNIBUS OBJECTION TO APPLICATIONS TO EMPLOY KELLY LAW GROUP LLP AND MATTHEW KELLY; BULLIVANT HOUSER BAILEY PC; KMC, INC.; AND ONSITE CONSULTING

2. I served the above-named document by the following means to the persons listed below:

a. By electronic transmission through the CM/ECF filing system of the US Bankruptcy Court, District of Nevada, to the parties listed below:

Aram Ordubegian ARENT FOX LLP	Attorneys for Debtor Hi-Five Enterprises, LLC
Jeanette E. McPherson	Attorneys for Bally Gaming, Inc., Creditor
Jennifer A. Smith LIONEL SAWYER & COLLINS	Attorneys for International Game Technology, Creditor
Janet L. Chubb JONES VARGAS	Attorneys for National Automobile Museum, Creditor
John F. Murtha WOODBURN & WEDGE	Attorneys for NV Energy and Reno-Sparks Convention and Visitors Authority, Creditors
Office of the US Trustee – RN - 11	Interested Party
Michael Edward Wilson ATTORNEY GENERAL OFFICE CASINO GAMING DIVISION	Attorneys for State Gaming Control Board, Interested Party
James A. Kohl HOWARD & HOWARD ATTORNEYS, PLLC	Attorneys for Konami Gaming, Inc., Creditor
Thomas H. Fell GORDON SILVER	Attorneys for R.E. Reno, LLC
Gregory K. Jones	Attorneys for R.E. Reno, LLC
Michael A.T. Pagni MCDONALD CARANO WILSON LLP	Attorneys for Truckee Meadows Water Authority
Catherine Cortez Masto, Attorney General Dennis L. Belcourt, Deputy Attorney General	Attorneys for Nevada Department of Taxation

b. By US Mail addressed as follow:

1 2 3 4	Andy S. Kong Mette H. Kurth ARENT FOX LLP 555 West Fifth Street, 48 <sup>th</sup> Floor Los Angeles, CA 90013	Attorneys for Debtor Hi-Five Enterprises, LLC
5 6 7	Daniel A. McDaniel NOMELLINI, GRILLI & MCDANIEL 235 East Weber Avenue P.O. Box 1461 Stockton, CA 95201	Attorneys for General Produce Co., Ltd., Creditor
8 9 10	Melissa S. Lor SCHNADER HARRISON SEGAL & LEWIS LLP One Montgomery Street, Suite 2200 San Francisco, CA 94104	Attorneys for International Game Technology, Creditor
11 12 13 14 15	Cecily A. Dumas FRIEDMAN DUMAS & SPRINGWATER LLP 150 Spear Street, Suite 1600 San Francisco, CA 94105  Lisa S. Gretchko HOWARD & HOWARD ATTORNEYS, PLLC 450 West Fourth Street Royal Oak, MI 48067	Attorneys for Konami Gaming, Inc., Creditor
16 17	William J. Lafferty HOWARD RICE NEMEROVSKI CANADY FALK Three Embarcadero Center, 7 <sup>th</sup> Floor San Francisco, CA 94111	Attorneys for NV Energy, Creditor
18 19 20	Shawn Christianson BUCHALTER NEMER 333 Market Street, 25 <sup>th</sup> Floor San Francisco, CA 94105	Attorneys for Oracle America, Inc. and Oracle Credit Corporation, Creditors
21 22	Joseph D. Frank FRANK/GECKER, LLP 325 N. LaSalle Street, Suite 625 Chicago, IL 60654	Attorneys for Pepsi Beverages Company, Creditor
23 24	Eric D. Goldberg 1901 Avenue of the Stars, 12 <sup>th</sup> Floor Los Angeles, CA 90067	Attorneys for R.E. Reno, LLC, Creditor
25 26	City of Reno P.O. Box 1900 Reno, NV 89505	Creditor

1  
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

Creditors Bureau USA 757 L Street Fresno, CA 93721	Creditor
William B. Cossitt Office of U.S. Trustee 300 Booth Street, Suite 2129 Reno, NV 89509	Interested Party

3. I declare under penalty of perjury that the foregoing is true and correct.

SIGNED: January 25, 2011

Brenda Rudolph  
 (Name of Declarant)

/s/ Brenda Rudolph  
 (Signature of Declarant)