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7
8 IN THE UNITED STATES BANKRUPTCY COURT
9 FOR THE DISTRICT OF ARIZONA

10 In re
11 MORTGAGES LTD.,
12 Debtor.

No. 2-08-bk-07465-RJH

Chapter 11

**OBJECTION TO TLC MOTION TO
CONTINUE STANDSTILL
AGREEMENT, HEARING DATES, OSC
AND CLAIMS OBJECTION
LITIGATION**

15 ML Manager LLC hereby objects to the “Motion to Continue, Standstill
16 Agreement, Hearing Dates and Deadlines Re the OSC and the Claims Objection
17 Litigation” filed by Tempe Land Company on September 15, 2009 and requests that the
18 Court deny the Motion summarily without hearing or further pleadings.

19 The Standstill Agreement, referenced in the Motion and entered in both this case
20 and Tempe Land Company case, expired of its own terms on September 15, 2009. The
21 parties could not reach a consensual agreement on a settlement or resolution of the many
22 issues. Tempe Land Company subsequently converted its case to a chapter 7. The
23 Engelman Berger firm was allowed in both cases to withdraw as counsel for the debtor
24 Tempe Land Company. A chapter 7 trustee has been appointed in the Tempe Land
25 Company case. Further ML Manager LLC filed a Motion for Stay Relief in the Tempe
26 Land Company case. The Motion requested in this case is procedurally improper and asks
27 that this Court impose a 60 day freeze (almost like a stay or court imposed moratorium)
28 by entering an order continuing the now expired consensual Standstill Agreement. ML

1 Manager LLC respectfully requests that the Court deny the Motion outright without
2 hearing or further pleadings and let the parties proceed as they deem appropriate.

3 Dated this 28th day of September, 2009.

4 FENNEMORE CRAIG, P.C.

5 By /s/ Cathy L. Reece

6 Cathy L. Reece
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8 Copies of the foregoing
9 mailed or emailed this date to:

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