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6
7 IN THE UNITED STATES BANKRUPTCY COURT
8 FOR THE DISTRICT OF ARIZONA

9 In re
10 Mortgages Ltd.,
11 Debtor.

Chapter 11

Case No. 2-08-BK-07465-RJH

**MOTION TO EXCEED PAGE LIMIT
REGARDING ML MANAGER LLC'S
RESPONSE AND OBJECTION TO
REV-OP GROUP'S EMERGENCY
MOTION FOR ENTRY OF ORDER:
(I) CLARIFYING CHAPTER 11 PLAN,
CONFIRMATION ORDER, AND
OTHER MATTERS RELEVANT TO
TRANSFER DECISION OF PASS-
THROUGH INVESTORS; AND (II)
EXTENDING THE TRANSFER
DECISION**

Hearing Date: October 8, 2009
Hearing Time: 11:00 a.m.

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20 Pursuant to Local Rule 9013-1(b), ML Manager LLC ("ML Manager") hereby
21 requests an Order from the Court allowing it to exceed Local Rule 9013-1(b)'s fifteen (15)
22 page limit with respect to ML Manager's Response and Objection to Rev-Op Group's
23 Emergency Motion for Entry of Order: (i) Clarifying Chapter 11 Plan, Confirmation
24 Order, and Other Matters Relevant to Transfer Decision of Pass-Through Investors; and
25 (ii) Extending the Transfer Decision, filed contemporaneously herewith.

26 ML Manager submits that good cause exists to exceed Local Rule 9013-1(b)'s page
27 limit, because the legal and factual issues are complex, and the Emergency Motion is
28 procedurally improper in many aspects, barred by principles of res judicata and equitable

1 estoppel, is substantively without merit, and warrants adequate discussion.

2 ML Manager has filed this motion to exceed the page limit after careful deliberation
3 and submits that it is appropriate under the circumstances for the Court to give ML Manager
4 leave to exceed Local Rule 9013-1(b)'s page limit.

5 DATED this 2nd day of October, 2009

6 FENNEMORE CRAIG, P.C.

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8 By /s/ Cathy L. Reece (005932)

9 Cathy L. Reece
10 Keith L. Hendricks
11 Attorneys for ML Manager LLC

11 COPY of the foregoing transmitted
12 electronically using the Court's ECF System
13 this 2nd day of October, 2009, to the
14 following party:

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19
20 By /s/ Stephanie R. Fulk-Higgs

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