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13 **Attorneys for Tempe Land Company LLC**

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

10 In re:

11 MORTGAGES LTD.,  
12 Debtor.

Chapter 7 Involuntary Proceedings  
Case No. 2:08-bk-07465-RJH

**REPLY TO OBJECTION TO TLC MOTION  
TO CONTINUE STANDSTILL  
AGREEMENT**

16 Tempe Land Company LLC (“TLC”), a creditor and interested party in this case, by and  
17 through its undersigned counsel, hereby files its Reply to the Objection to TLC’s Motion to Continue  
18 Standstill Agreement (“Motion”) and requests this Court extend the deadlines more fully described in  
19 the Motion to **November 16, 2009**

20 The Objection simply states that Standstill Agreement expired and that the ML Manager filed  
21 a lift stay motion in the converted (Chapter 7) TLC case. Notwithstanding, these developments are not  
22 significant enough to warrant a summary denial of the Motion. Doing so would negate extensive  
23 settlement discussions and kill any chance the parties have at settling litigation and avoiding the  
24 inevitably high cost of continuing the same. Further, the bankruptcy court in the TLC case just  
25 recently approved the retention of the new counsel and, since said counsel was not involved in the  
26 settlement talks or prior litigation, it will need at least need until **November 16, 2009**, to get caught up  
27 to speed on the issues raised by the dispute between the ML Manager and TLC.  
28

1 WHEREFORE, Tempe Land Company requests that this Court enter an order extending the  
2 deadlines contained in the Standstill Agreement pursuant to the form of Order filed simultaneously  
3 herewith.

4 DATED this 16th day of October, 2009.

5 AIKEN SCHENK HAWKINS & RICCIARDI P.C.

6  
7 By 

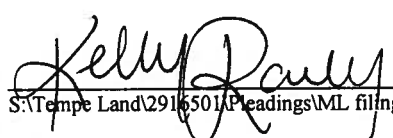
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9  
10  
11 COPY of the foregoing mailed, or served  
12 via electronic notification\* or fax\*\* or if so marked,  
this 16th day of October, 2009, to:

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