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

8 In re

9 MORTGAGES LTD.,

10 Debtor.

Chapter 11

Case No. 2:08-bk-07465-RJH

11 **EMERGENCY MOTION FOR ORDER**  
12 **APPROVING A LIMITED EXTENTION OF**  
13 **THE DEADLINE FOR PASS-THROUGH**  
14 **INVESTORS IN RODEO RANCH LOAN AND**  
**ALL STATE XVI LOAN TO TRANSFER**  
**THEIR FRACTIONAL INTERESTS IN**  
**FORECLOSED PROPERTY**

15 The Court previously has granted extensions of the deadline under the First  
16 Amended Plan of Reorganization for the Pass-Through Investors to make their decisions  
17 whether to transfer their fractional interests in the ML Notes and Deeds of Trust into the  
18 applicable Loan LLC set up under the Plan. That deadline expires October 31, 2009. ML  
19 Manager LLC is not seeking to extend that deadline further. The Court issued its  
20 Memorandum Decision of October 21, 2009 granting in part and denying in part the  
21 Motion to Clarify filed by the 18 Rev Op investors and entered the Order Amending the  
22 Memorandum Decision on October 27, 2009. Newsletters went out to the Pass-Through  
23 Investors that the October 31, 2009 transfer deadline would not be extended. So October  
24 31, 2009 is still the deadline.

25 However, ML Manager requests a limited extension for Pass-Through Investors in  
26 the Rodeo Ranch Estates, LLC loan (Loan No. 857906) and All State Associates of Pinal

1 XVI, LLC loan (Loan No. 859506), both of which have been foreclosed and in which the  
2 Pass Through Investors hold a fractional interest in the real property. Rather than transfer  
3 or indorse their Note interest and their beneficial interest in the Deed of Trust, the  
4 investors in these two loans will transfer their fractional interests in real property from the  
5 foreclosed ML Notes and Deeds of Trust into the Loan LLCs using a special warranty  
6 deed. ML Manager would like an extension through November 16, 2009.

7 Because these are interests in real property rather than personal property, the title  
8 company had to be asked to review and approve the documents in advance. The title  
9 company and ML Manager need additional time to resolve the issues. The transfer  
10 documents were drafted and reviewed by the title company. Additional documents are still  
11 being reviewed by the title company and certain issues about the legal and title issues  
12 have arisen that required additional legal review that has slowed down and delayed the  
13 process. The Pass-Through Investors in those two loans cannot execute their transfer  
14 documents until they are finalized and finally approved by the title company. This should  
15 be completed and all documents signed within the next two weeks. As a result, ML  
16 Manager requests that the Court grant a limited extension to November 16, 2009 for these  
17 two loans. Counsel has discussed this request with the Securities and Exchange  
18 Commission counsel who indicated that she would not recommend that the SEC object to  
19 this limited extension for these two loans.

20 ML Manager has brought this as an emergency motion because of the October 31,  
21 2009 deadline and requests that the Court grant it on an emergency basis.

22 WHEREFORE, ML Manager LLC requests that the Court extend the deadline  
23 through November 16, 2009 for Pass-Through Investors in the Rodeo Ranch Estates, LLC  
24 loan (Loan No. 857906) and All State Associates of Pinal XVI, LLC loan (Loan No.  
25 859506), both of which have been foreclosed and in which the Pass-Through Investors  
26 hold a fractional interest in the real property, to transfer and to provide their documents to

1 ML Manager LLC to transfer their fractional interests in real property from the foreclosed  
2 ML Notes and Deeds of Trust into the Loan LLCs.

3 DATED: October 29, 2009

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FENNEMORE CRAIG, P.C.

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By /s/ Cathy L. Reece

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Cathy L. Reece  
Attorneys for ML Manager LLC

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COPY of the foregoing emailed  
8 to the parties on the Service List.

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/s/ Susan Stanczak-Ingram

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