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11 **IN THE UNITED STATES BANKRUPTCY COURT**
12 **FOR THE DISTRICT OF ARIZONA**

13 In re:

14 MORTGAGES LTD.,

15 Debtor

16 In Proceedings Under Chapter 11

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

18 **MOTION FOR EMERGENCY**
19 **HEARING ON EMERGENCY MOTION**
20 **FOR ENTRY OF ORDER: (I)**
21 **CONFIRMING WILLIAM HAWKINS**
22 **REMAINS ON THE ML BOARD; (II)**
23 **REQUIRING THE ML MANAGER TO:**
24 **(1) RECTIFY ITS CORPORATE**
25 **IRREGULARITIES; (2) PROVIDE AN**
26 **ACCOUNTING; (3) ACKNOWLEDGE**
27 **THE TRANSFERS OF NON-**
28 **TRANSFERRING INVESTORS'**
INTERESTS IN NOTES; AND (III)
GRANTING OTHER RELATED
RELIEF

Date of Hearing: N/A
Time of Hearing: N/A

29 This Motion for Expedited Hearing is filed by the Rev Op Group. The Rev Op
30 Group hereby requests entry of an order setting an emergency hearing on its *Emergency*
31 *Motion for Entry of Order: (I) Confirming William Hawkins Remains on the ML Board;*
32 *(II) Requiring the ML Manager to: (1) Rectify Its Corporate Irregularities; (2) Provide*
33 *an Accounting; (3) Acknowledge the Transfers of Non-Transferring Investors' Interests*

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1 *in Notes; and (III) Granting Other Related Relief* (the “**Motion**”). In support of this
2 Emergency Motion, the Rev Op Group submits as follows:

3 1. The ML Manager presently takes the position that William Hawkins is no
4 longer a board member on the theory that the other board members have the authority to
5 remove him from the board without first obtaining a court order. The ML Manager took
6 this action after the Rev Op Group sent a demand letter addressing (among other things) a
7 number of board irregularities that needed to be rectified by the ML board.

8 2. Thus, the ML Manager’s board has taken upon itself to “oust” Mr. Hawkins
9 even though this Court recently rejected their attempt to oust Mr. Hawkins from the ML
10 board. *See* Order Denying Motion To Remove William Hawkins dated January 11, 2010.
11 Because of this improper move and the seriousness of the board irregularities that need to
12 be resolved, the Rev Op Group requests an emergency hearing on the Motion.

13 **WHEREFORE**, the Rev Op Group requests that the Court enter an order: (i)
14 setting an emergency hearing on the Motion; and (ii) granting the Rev Op Group any
15 other and further relief as it deems just and proper under the circumstances presented
16 herein.

17 RESPECTFULLY SUBMITTED this 22nd day of February, 2010.

18 **BRYAN CAVE LLP**

19
20 By: /s/ RJM, #013334

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1 COPY of the foregoing served this
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