

1 ILENE J. LASHINSKY (#003073)  
2 United States Trustee  
3 District of Arizona

4 LARRY L. WATSON (CA Bar #193531)  
5 230 North First Avenue, Suite 204  
6 Phoenix, Arizona 85003-1706  
7 602-682-2600

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

10 In re:  
11 MORTGAGES LTD.,  
12 Debtor.

In Proceedings Under Chapter 11  
Case No. 2-08-bk-07465-RJH

**STIPULATED MOTION FOR ORDER  
TO RESCHEDULE EVIDENTIARY  
HEARING AND REVISING  
DISCOVERY SCHEDULE RE:**

**SECOND INTERIM AND FINAL  
AMENDED APPLICATION FOR  
ALLOWANCE AND PAYMENT OF  
FEES FOR SERVICES RENDERED  
AND EXPENSES INCURRED BY  
GREENBERG TRAUIG, LLP**

**(Relates to Docket No. 1800)**

**Requested Hearing Date**

**Date: August 10, 2010**

**Time: 9:00 a.m.**

**Location: Courtroom 603**

13  
14  
15  
16  
17  
18  
19  
20  
21 Greenberg Traurig LLP (“GT”), the United States Trustee, Kevin T. O’Halloran,  
22 Liquidating Trustee of Mortgages, Ltd., and ML Manager, LLC (collectively with GT, the  
23 “Parties”) respectfully request that the Court vacate the 9:00 a.m. May 11, 2010 hearing  
24 regarding the *Second Interim and Final Amended Application for Allowance and Payment*  
25 *of Fees for Services Rendered and Expenses Incurred by Greenberg Traurig, LLP* (the  
26 “GT Fee Application”), filed on June 12, 2009 [Docket Number 1800], and set the

1 evidentiary hearing on the GT Fee Application to be held at **9:00 a.m. on August 10,**  
2 **2010.**

3 The Parties also request the Court to set the following discovery schedule:

4 <b>July 8, 2010</b>	Disclosure of Experts
5 <b>July 15, 2010</b>	Exchange of Expert Reports
6 <b>July 22, 2010</b>	Conclude Discovery, including experts
7 <b>July 29, 2010</b>	Joint Pretrial Statements and Pretrial Memorandum (if any)
8 <b>August 10, 2010</b>	Evidentiary Hearing.

9 A proposed form of Order is attached hereto and was lodged concurrently herewith  
10 for the Court's consideration.

11 RESPECTFULLY SUBMITTED this 11<sup>th</sup> day of May, 2010.

12 **GREENBERG TRAUIG, LLP**

**UNITED STATES TRUSTEE**

13 By: /s/ David D. Cleary (AZ No. 011826)  
David D. Cleary

By: /s/ Larry L. Watson (CA No. 193531)  
Larry L. Watson, Trial Attorney

14 **STRADLEY RONON STEVENS &**  
15 **YOUNG**

**FENNEMORE CRAIG, P.C.**

16 By: /s/ Michael D. O'Mara (PA No. 78472)  
17 Michael D. O'Mara/Mark J. Dorval  
18 Counsel for Kevin T. O'Halloran,  
Liquidating Trustee for Mortgages, Ltd.

By: /s/ Keith L. Hendricks (AZ No. 012750)  
Cathy L. Reece\Keith L. Hendricks  
Counsel for ML Manager, LLC

19 **DeCONCINI McDONALD YETWIN &**  
20 **LACEY, P.C.**

21 By: /s/ Shelton L. Freeman (AZ No. 9687)  
22 Shelton L. Freeman  
23 Special Counsel for G. Grant Lyon,  
24 Ch. 11 Trustee for Radical Bunny, L.L.C.