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9 *John Vinson, Jerome Nosanchuk, Josh Nosanchuk,*  
10 *Sara Nosanchuk, and Douglas Gardner*

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

13 **In re:**  
14 **MORTGAGES LTD., an Arizona corporation,**  
15 **Debtor.**

16 In Proceedings Under Chapter 11  
17 (converted from Chapter 7)

18 **Case No. 2:08-bk-07465-PHX-RJH**

19 **MOTION TO EXTEND OBJECTION**  
20 **PERIOD TO ML MANAGER'S**  
21 **ALLOCATION MODEL**

22 Investors Bruce Buckley, Linda Reeves, John Vinson, Jerome Nosanchuk, Josh  
23 Nosanchuk, Sara Nosanchuk, and Douglas Gardner move this Court to extend the objection  
24 period for ML Manager's Allocation Model. By all appearances, ML Manager's  
25 Allocation Model is a critical document. It is complex. It is highly confidential. (See  
26 Docket 2920). ML Manager represents that it has "spent literally hundreds of hours,  
27 employed accounting and legal professionals, and considered everything from small details  
28 or implications to large macro philosophies" in creating the Model. And although the

1 Model is being first applied to the Newman loan, ML Manager wants to apply it to all  
2 Investors on all other loans. Thus, the Model has far reaching implications. It is not an  
3 exaggeration for these Investors to suggest that, with the exception of the Plan of  
4 Reorganization, perhaps no other filing in this case has been more important to Investors.  
5

6 ML Manager apparently undertook no special notice procedure to ensure that all  
7 affected Investors receive notice the Model and its potential far-reaching implications.  
8 Moreover, ML Manager filed its "Notice" on September 1, 2010, unilaterally setting  
9 September 10, 2010, as the deadline for objections. **That is nine days** to review and  
10 analyze what, by ML Manager's own admission, took "hundreds of hours" and significant  
11 resources to create. **Nine days.** This short objection period, together with the lack of  
12 adequate notice, is tantamount to a lack of due process.  
13  
14

15 These factors justify this Court is extending the objection period for Investors.  
16 Therefore, these Investors request that the deadline for all Investors to object be extended, at  
17 a minimum, 60 days.  
18

19 DATED this 21st day of September, 2010.

20  
21 **THOMAS SCHERN RICHARDSON, PLLC**

22 By /s/ Richard R. Thomas

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26 *Attorneys for Investors Bruce Buckley, Linda Reeves,  
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ORIGINAL *electronically filed* via ECF this 21<sup>st</sup> day of September, 2010,  
with the Clerk of the United States Bankruptcy Court, District of Arizona and  
*electronically delivered* via ECF to all registered parties.

/s/ Kristin E. Barnhart