

1 SHELTON L. FREEMAN (AZ #009687)  
2 **DECONCINI McDONALD YETWIN & LACY, P.C.**  
3 6909 East Main Street  
4 Scottsdale, Arizona 85251

4 Ph: (480) 398-3100  
5 Fax: (480) 398-3101  
6 E-mail: [tfreeman@lawdmyl.com](mailto:tfreeman@lawdmyl.com)

6 Counsel to Radical Bunny, L.L.C.

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

9 In re:

10 MORTGAGES LTD.,

13 Debtor.

Chapter 11

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

12 **RADICAL BUNNY'S MOTION FOR**  
13 **EXPEDITED HEARING ON**  
14 **SUPPLEMENTAL APPLICATION**  
15 **AND TO SET OBJECTION DEADLINE**

16 **Hearing Date: TBD**  
17 **Hearing Time: TBD**  
18 **Location: TBD**

19 **Related Docket Nos. 3018, 3021 &**  
20 **3031**

20 Creditor RADICAL BUNNY, L.L.C. ("RBLLC"), by and through its duly  
21 authorized attorneys, hereby moves for an expedited hearing regarding its  
22 "Supplemental Application Pursuant to 11 U.S.C. § 503(B)(3)(D) and (4) for  
23 Allowance and Payment of Administrative Claim" ("Supplemental Application"),  
24 filed on January 3, 2011, DE 3021, as ordered by this Court.

25 Pursuant to a Notice of Hearing, DE 3031, a hearing is set for January 20,  
26 2011 at 3:00 p.m. on the "Liquidating Trust's Motion for Stay Pending Appeal and  
27 for Stay of Supplemental Application Pursuant to 11 U.S.C. § 503(B)(3)(D) and (4)  
28 for Allowance and Payment of Administrative Claim" ("Combined LT Stay

1 Motion”), DE 3025, filed by “Lead Counsel for the ML Liquidating Trust” (“LT  
2 Counsel”).

3 RBLCC seeks an expedited hearing to be held on the Supplemental  
4 Application at the same time as the Combined LT Stay Motion. A timely  
5 determination of the Supplemental Application is required in connection with the  
6 Combined LT Stay Motion. RBLCC timely filed the Supplemental Application  
7 pursuant to this Court’s Order “Findings of Fact and Conclusions of Law and  
8 Amended Order Granting Radical Bunny’s Administrative Claim for Substantial  
9 Contribution”, DE 3018. As a result, no party in interest would be prejudiced by  
10 setting the expedited hearing.

11 RBLCC further seeks a deadline of January 19, 2011, for the filing of  
12 objections to the Supplemental Application.

13 Based on the foregoing, RBLCC requests that this Court enter the  
14 proposed order filed herewith to:

- 15 (1) schedule an expedited hearing on the Supplemental Application for **January**  
16 **20, 2011 at 3:00 p.m.**  
17  
18 (2) order that all objections to the Supplemental Application be filed by **January**  
19 **19, 2011.**

20 DATED this 12th day of January, 2011.

21 DECONCINI McDONALD YETWIN & LACY, P.C.

22  
23 BY /s/ SHELTON L. FREEMAN  
24 Shelton L. Freeman  
25 Counsel to Radical Bunny, L.L.C.

26 COPIES sent via the U.S. Bankruptcy  
27 Court’s ECF noticing system this  
28 12th day of January, 2011.

1 **COPIES** served by e-mail  
2 this 12th day of January, 2011, to:

3 Sharon B. Shively, Esq.  
4 Sacks Tierney P.A.  
5 [sharon.shively@sackstierney.com](mailto:sharon.shively@sackstierney.com)  
6 Attorneys for ML Liquidating Trustee

7 Mark J. Dorval, Esq.  
8 Stradley Ronon Stevens & Young LLP  
9 [mdorval@stradley.com](mailto:mdorval@stradley.com)  
10 Attorneys for ML Liquidating Trust

11 Cathy L. Reece, Esq.  
12 Fennemore Craig, P.C.  
13 [creece@fclaw.com](mailto:creece@fclaw.com)  
14 Attorneys for ML Manager, LLC

15 Richard M. Lorenzen, Esq.  
16 Perkins Coie Brown & Bain P.A.  
17 [rlorenzen@perkinscoie.com](mailto:rlorenzen@perkinscoie.com)  
18 Attorneys for Official Unsecured Creditors Committee  
19 of Radical Bunny, LLC

20 William Scott Jenkins, Esq.  
21 Myers & Jenkins, P.C.  
22 [wsj@mjlegal.com](mailto:wsj@mjlegal.com)  
23 Attorneys for ML Liquidating Trust

24 By /s/ Kara Gibson Schrader