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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA

In re
MORTGAGES, LTD.,
Debtor.

Chapter 11
2:08-BK-07465-RJH

**EMERGENCY MOTION FOR
SUPPLEMENTAL EX PARTE ORDER
ENFORCING COURT'S JANUARY 20,
2011 ORDER**

On March 29, 2011, this Court entered the Ex Parte Order Enforcing The Court's January 20, 2011 Order Approving The Distribution of Funds (Docket No. 3126) requiring Mr. Barness and/or Barness Investment Limited Partnership to return erroneously distributed funds to ML Manager. The Order also required Bank of America to immediately freeze moneys in a certain account. ML Manager served the Order on Mr. Barness and Barness Investment Limited Partnership and upon Bank of America. Since that time ML Manager has learned that Mr. Barness and/or Barness Investment Limited Partnership have other accounts at Bank of America that should be frozen to ensure Mr. Barness' return of the erroneously distributed funds. If the Supplemental Ex Parte Order is not granted and entered then ML Manager may not be able to recover the funds and may be irreparably injured. Accordingly, ML Manager requests that the Court enter a supplemental order freezing these additional accounts until the time that Mr. Barness

1 and/or Barness Investment Limited Partnership has returned or paid the erroneously
2 distributed funds or until another order is obtained from this Court. The proposed form of
3 Supplemental Ex Parte Order is attached hereto as Exhibit A.

4 DATED this 6th day of April, 2011.

5 FENNEMORE CRAIG, P.C.

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7 By /s/ Cathy L. Reece
8 Cathy L. Reece
9 Keith L. Hendricks
Attorneys for ML Manager LLC

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