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10 Counsel for the Rev Op Investors

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

13 In re:

14 MORTGAGES LTD.,

15 Debtor.

16 Chapter 11

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

18 **OBJECTION TO ML MANAGER'S MOTION
19 TO SELL REAL PROPERTY**

20 **(REAL PROPERTY CONSISTING OF
21 APPROXIMATELY 14.29 ACRES LOCATED
22 AT THE SW CORNER OF MILLER AND
23 MCDOWELL ROADS, SCOTTSDALE,
24 MARICOPA COUNTY, ARIZONA)**

25 Hearing Date: July 19, 2011

26 Hearing Time: 10:00 a.m.

27 Bear Tooth Mountain Holdings, LLP; Cornerstone Realty and Development Inc. Defined
28 Benefit Plan and Trust; AJ Chandler 25 Acres, LLC; Queen Creek XVIII, L.L.C.; Brett M.
Benefit Plan and Trust; AJ Chandler 25 Acres, LLC; Queen Creek XVIII, L.L.C.; Brett M.
McFadden; and Morley Rosenfield, M.D. P.C. Restated Profit Sharing Plan; and/or their
successors and assigns (collectively, the "Rev Op Investors"), hereby file this Objection to ML
Manager's *Motion To Sell Real Property* [DE #3255] dated June 24, 2011 (the "Sale Motion").
In support of this Objection, the Rev Op Investors hereby incorporate by reference herein
previous sale-motion objections filed by the Rev Op Investors and affiliated parties (and the
arguments and authorities set forth therein) at the following Docket Entry numbers: DE #2499;
DE #2504; DE #2878; DE #2881; DE #2965; DE #3003; DE #3095; DE #3153; DE #3185; and
DE #3187.

1 The Rev Op Investors hereby reserve all of their rights with respect to the proposed sale
2 of the subject property. Various Rev Op Investors previously recorded terminations of agency
3 that put prospective buyers on notice that any sale will be subject to the Rev Op Investors'
4 interests.

5 WHEREFORE, the Rev Op Investors request that the Court enter an order denying the
6 Sale Motion and granting to the Rev Op Investors such other relief as it deems appropriate.

7 DATED this 12th day of July, 2011.

8 BRYAN CAVE LLP

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10 By /s/ BAS, #022721

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15 Counsel for the Rev Op Investors

16 COPY of the foregoing served via email
17 this 12th day of July, 2011 upon:

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27 /s/ Sally Erwin
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