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6 IN THE UNITED STATES BANKRUPTCY COURT  
7 FOR THE DISTRICT OF ARIZONA

8 In re

9 MORTGAGES LTD.,

10 Debtor.

Chapter 11

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

**EMERGENCY MOTION TO ACCELERATE  
HEARINGS AND SHORTEN NOTICE  
PERIOD**

13 ML Manager LLC (“ML Manager”), requests that the Court enter an order  
14 accelerating the hearings and shortening the notice period for its (1) Motion To Approve  
15 Settlement of Wolfswinkel Loans (Docket No. 3652), and (2) Motion to Approve  
16 Settlement with Mortgages Ltd. 401k Plan (Docket No. 3653)(“Settlement Motions”).  
17 The Court currently has a hearing set on December 11, 2012 at 11:00 a.m. on ML  
18 Manager’s Motion to Sell Real Property (the HH Motion)(Docket No. 3641). ML  
19 Manager requests that the two Settlement Motions above be set for hearing on December  
20 11, 2012 at the same time and place as the other Motion and requests that the Court  
21 accelerate the hearings and shorten the notice period accordingly. Responses can be due  
22 Friday December 7, 2012 by 5 p.m. The settlements in the Settlement Motions all have  
23 short time frames. The settlement with the 401k Plan must be closed by December 31,  
24 2012. The Wolfswinkel settlement could provide money as early as January 16, 2013 if  
25 approved. Counsel has become aware that the Court will not be available until January 7,  
26

1 2013 or later for a hearing if this is not accelerated. ML Manager is concerned it will lose  
2 the 401k Plan settlement and the Wolfswinkel settlement if they are not heard on an  
3 accelerated basis. Rather than lose the potential for the settlements ML Manager requests  
4 that the Court accelerate the hearings and shorten the notice accordingly. ML Manager  
5 will immediately notice the hearing electronically. Copies of the Settlement Motions were  
6 served electronically the day they were filed.

7 WHEREFORE, ML Manager LLC requests that the Court enter an order  
8 accelerating the hearings and shortening the notice period accordingly for the Settlement  
9 Motions, and for such other and further relief as is just and proper under the  
10 circumstances.

11 DATED: November 30, 2012

12 FENNEMORE CRAIG, P.C.

13 By /s/ Cathy L. Reece  
14 Cathy L. Reece  
15 Attorneys for ML Manager LLC  
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