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5 Attorneys for ML Manager LLC

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

11 **NOTICE OF LODGING STIPULATED**
12 **ORDER CONCERNING INSIDER**
13 **ESCROW FOR FURST AND KATZ**

14
15 NOTICE IS HEREBY GIVEN that ML Manager has lodged a *Stipulated Order*
16 *Approving Concerning Insider Escrow for Furst and Katz*, which Order is attached as
17 Exhibit A.

18
19 DATED: December 13, 2012

20 FENNEMORE CRAIG, P.C.

21 By /s/ Cathy L. Reece

22 Cathy L. Reece
23 Attorneys for ML Manager LLC
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25
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EXHIBIT

A

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11 **STIPULATED ORDER CONCERNING**
12 **INSIDER ESCROW FOR FURST AND**
13 **KATZ**

14 On January 20, 2011, the Court entered an Order Regarding Distributions of
15 Proceeds (Docket No. 3051) (“Order”) which among other things governed the
16 distributions to be made to Insiders (as defined in the Order). Paragraph O of the Order
17 stated that until further Order of the Court ML Manager was to escrow in an Insider
18 Escrow or other account (as defined in the Order) any distributions to be made to Lisa A.
19 Katz, Personally and as Trustee of the Lisa A. Katz Trust, Dated March 28, 2004 (“Katz”)
20 and Robert G. Furst, Personally and as Trustee of the Robert G. Furst & Associates, Ltd.,
21 Defined Benefit Pension Plan (“Furst”) and to the other identified Insiders. The ML
22 Liquidating Trust has now settled its litigation with Furst and Katz and has no objection to
23 distributions being made to Furst and Katz to which they are entitled under the Allocation
24 Model. The Trustee for the ML Liquidating Trust and counsel for ML Manager hereby
25 stipulate to the entry of this Stipulated Order as stated below. Based on this Stipulation
26 and for good cause shown,

1 IT IS HEREBY ORDERED that ML Manager, any Loan LLC and the MP Funds
2 shall make appropriate distributions from any of the ML Loans or from the Insider Escrow
3 or other accounts to Furst and Katz after deduction for their proportionate share of costs
4 and expenses pursuant to the Allocation Model and the Order. The restriction on
5 distributions and requirement to escrow such distributions in Paragraph O of the Order
6 shall no longer apply to Furst and Katz.

7 DATED AND ORDERED AS STATED ABOVE.
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10 Agreed to as to form and substance:

11 FENNEMORE CRAIG, P.C.
12 By /s/ Cathy L. Reece
Attorney for ML Manager

13 ML LIQUIDATING TRUST
14 By /s/ Matthew Hartley
15 Trustee of the ML Liquidating Trust
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