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12 Counsel for the Rev Op Investors

13 **IN THE UNITED STATES BANKRUPTCY COURT**
14 **FOR THE DISTRICT OF ARIZONA**

15 In re:
16 MORTGAGES LTD.,
17 Debtor.

Chapter 11

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

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

**REAL PROPERTY LOCATED IN THE
VICINITY OF BUCHANAN STREET AND
3RD STREET, PHOENIX, ARIZONA,
KNOWN AS THE SOJAC PROPERTY**

Hearing Date: February 13, 2012

Hearing Time: 1:30 p.m.

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20 Brett M. McFadden, L.L.J. Investments, LLC (as successor in interest to The Lonnie Joel
21 Krueger Family Trust), Pueblo Sereno Mobile Home Park, L.L.C., QC MK Custom Residential,
22 L.L.C. (as successor in interest to Queen Creek XVIII, L.L.C.), and/or their successors and
23 assigns (collectively, the "Rev Op Investors") hereby file this Objection to ML Manager's
24 *Motion To Sell Real Property* [DE #3416] dated January 25, 2012 (the "Sale Motion"). In
25 support of this Objection, the Rev Op Investors hereby incorporate by reference herein previous
26 sale-motion objections filed by the Rev Op Investors and affiliated parties (and the arguments
27 and authorities set forth therein) at the following Docket Entry numbers: DE #2499; DE #2504;
28

1 DE #2878; DE #2881; DE #2965; DE #3003; DE #3095; DE #3153; DE #3185; DE #3187; DE
2 #3262; DE #3307; DE #3327; DE #3343; and DE #3380.

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

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

9 DATED this 6th day of February, 2012.

10 BRYAN CAVE LLP

11
12 By /s/ JAS, #026359

13 Robert J. Miller
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15 Justin A. Sabin
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17 Phoenix, AZ 85004-4406
18 Counsel for the Rev Op Investors

17 COPY of the foregoing served via email
18 this 6th day of February, 2012 upon:

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27 /s/ Robyn L. Kerns