

1 Robert J. Miller, Esq. (#013334)
2 Bryce A. Suzuki, Esq. (#022721)
3 Justin A. Sabin, Esq. (#026359)
4 **BRYAN CAVE LLP**
5 Two North Central Avenue, Suite 2200
6 Phoenix, Arizona 85004-4406
7 Telephone: (602) 364-7000
8 Facsimile: (602) 364-7070
9 Internet: rjmiller@bryancave.com
10 bryce.suzuki@bryancave.com
11 justin.sabin@bryancave.com

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.

18 Chapter 11

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

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

22 **REAL PROPERTY LOCATED AT THE**
23 **NORTHEAST CORNER OF TWEEDY RD.**
24 **AND HOWARD RD. IN CITY OF ELOY,**
25 **COUNTY OF PINAL, ARIZONA**

26 Hearing Date: July 16, 2012

27 Hearing Time: 2:30 p.m.

28 AJ Chandler 25 Acres, L.L.C., Cornerstone Realty and Development, Inc., L.L.J.
Investments, LLC (as successor in interest to Louis B. Murphey, James C. Schneck Rev. Trust,
and The Lonnie Joel Krueger Family Trust), Morley Rosenfield, M.D. P.C. Restated Profit
Sharing Plan, Pueblo Sereno Mobile Home Park, L.L.C., Revocable Living Trust of Melvin L.
Dunsworth, Jr., 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 #3516] dated June 26,
2012 (the "Sale Motion"). The property consists of raw land in Eloy, Arizona.

Pursuant to the Sale Motion, ML Manager seeks a comfort order that it is authorized to
sell the property for approximately \$1.5 million. The property secures a loan with a principal

1 balance of \$30 million, plus interest and fees. In addition, the property is encumbered by
2 statutory liens for unpaid real property taxes in excess of \$884,000. It appears that ML Manager
3 failed to appeal massively inflated tax assessments and has otherwise failed to protect the
4 property and investors.

5 The Rev Op Investors object to the sale of their tenant-in-common interests in the
6 property. ML Manager has not explored partition, which would be entirely practicable for this
7 kind of property, and has not otherwise attempted to demonstrate by admissible evidence the
8 efforts undertaken to maximize value for the investors ML Manager purports to serve.

9 In further support of this Objection, the Rev Op Investors hereby incorporate by reference
10 herein previous sale-motion objections filed by the Rev Op Investors and affiliated parties (and
11 the arguments and authorities set forth therein) at the following Docket Entry numbers: DE
12 #2499; DE #2504; DE #2878; DE #2881; DE #2965; DE #3003; DE #3095; DE #3153; DE
13 #3185; DE #3187; DE #3262; DE #3307; DE #3327; DE #3343; DE #3380; DE #3428; and DE
14 #3429.

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

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

21 DATED this 12th day of July, 2012.

22 BRYAN CAVE LLP

23
24 By /s/ JAS, #026359

25 Robert J. Miller

26 Bryce A. Suzuki

27 Justin A. Sabin

28 Two North Central Avenue, Suite 2200

Phoenix, AZ 85004-4406

Counsel for the Rev Op Investors

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COPY of the foregoing served via email
this 12th day of July, 2012 upon:

Cathy L. Reece, Esq.
Fennemore Craig, P.C.
3003 North Central Avenue, Suite 2600
Phoenix, Arizona 85012-2913
creece@fclaw.com
Counsel for ML Manager LLC

Keith L. Hendricks, Esq.
Moyes Sellers & Hendricks
1850 North Central Avenue, Suite 1100
Phoenix, Arizona 85004
khendricks@law-msh.com
Counsel for ML Manager LLC

/s/ Robyn L. Kerns