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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 Sell Real  
15 Property concerning the Foothill Property (Docket No. 3646), (2) Motion to Approve  
16 Amendment to Sale Agreement Previously Approved concerning 3520 N. 70<sup>th</sup> Street  
17 property (Docket No. 3647) and (3) Motion to Approve Short Sale of 26 acres in Rancho  
18 Vistoso (Docket No. 3648). The Court currently has a hearing set on December 11, 2012  
19 at 11:00 a.m. on another ML Manager Motion to Sell Real Property (the HH  
20 Motion)(Docket No. 3641). ML Manager requests that the three Motions above be set for  
21 hearing on December 11, 2012 at the same time and place as the other Motion and  
22 requests that the Court accelerate the hearings and shorten the notice period accordingly.  
23 Responses can be due Friday December 7, 2012 by 5 p.m. All three sales reflected in the  
24 three Motions have short time frames. The 70<sup>th</sup> Street sale which is merely an amendment  
25 to an existing sale agreement to allow a Seller Carryback can close by December 27,  
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1 2012, the Foothills sale for which \$300,000 earnest money has been deposited can close  
2 by January 28, 2013 and the Rancho Vistoso 26 acre sale with \$100,000 earnest money  
3 can close by January 21, 2013 if the Court can approve the sales at the December 11, 2012  
4 hearing. Counsel has become aware that the Court will not be available until January 7,  
5 2013 or later for a hearing if this is not accelerated. ML Manager is concerned it will lose  
6 the sales by default if they are not heard on an accelerated basis. The title company is  
7 requiring the 14 day appeal period to expire before it will issue title insurance and close  
8 the sales. Rather than lose the potential for the sales ML Manager requests that the Court  
9 accelerate the hearings and shorten the notice accordingly. ML Manager will immediately  
10 notice the hearing and Motions electronically.

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

14 DATED: November 29, 2012

15 FENNEMORE CRAIG, P.C.

16 By /s/ Cathy L. Reece  
17 Cathy L. Reece  
18 Attorneys for ML Manager LLC

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