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1 Earl Geller
4531 N. 16th St., #103
2 Phoenix, AZ 85016
3 Trustee; Under First Trust
Company of Onaga, Cust. FBO
Earl Geller IRA; Trustee
4 Hershman Living Trust and
Hershman Family, LLC

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CLERK
U.S. BANKRUPTCY
DISTRICT OF ARIZONA

5
6 IN THE UNITED STATES BANKRUPTCY COURT
7 FOR THE DISTRICT OF ARIZONA

8
9 In Re:)

10 MORTGAGES, LTD.,)

11 Debtor)
12 -----)

Chapter 11 Proceedings
NO 2:08-BK-07465-PHX-RJH
RESPONSE TO ML LIQUIDATING
TRUST'S OMNIBUS OBJECTION TO
CLAIMS AND MOTION TO EXPUNGE,
REDUCE OR RECLASSIFY CLAIMS

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15 COME NOW Earl Geller, Trustee of the Martin Hershman Living
16 Trust, dated October 17, 1996, The Hershman Family L.L.C, an
17 Arizona Limited Liability Company, Earl Geller and Joyce Tobe
18 Rocamora Geller, Trustees of the Geller Family Revocable Trust
19 dated July 31, 2003 and First Trust Company of Onaga, Custodian
20 FBO Earl Geller IRA #41021xxxxx, and hereby respond and object
21 to ML Liquidating Trust's Omnibus Objection to Claims and Motion
22 to Expunge, Reduce or Reclassify such Claims (the "the
Objection"). Claimants respectfully request an evidentiary
hearing or trial upon ML Liquidating Trusts' Objections.

23 WHEREFORE, these responding parties request that the Court,
24 after an evidentiary hearing or trial, deny the relief as sought
by ML Liquidating Trustee.

25 RESPECTFULLY SUBMITTED this 11th day of November, 2009.

Earl Geller

Earl Geller
4531 N. 16th St., #103
Phoenix, AZ 85016

Copy of the foregoing mailed
this 12 day of November, 2009
to William Scott Jenkins
Myers & Jenkins, P. C.
One East Camelback Rd., #500
Phoenix, AZ 85012
Counsel for the Kevin T.
O'Halloran Trustee of the
ML Liquidating Trust.

Earl Geller

Earl Geller