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11 **IN THE UNITED STATES BANKRUPTCY COURT**
12 **FOR THE DISTRICT OF ARIZONA**

13 In re:
14 MORTGAGES LTD.,
15 Debtor.

16 In Proceedings Under Chapter 11

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

18 **RESPONSE TO ML LIQUIDATING
19 TRUST'S OMNIBUS OBJECTION TO
20 CLAIMS AND MOTION TO
21 EXPUNGE, REDUCE OR
22 RECLASSIFY SUCH CLAIMS**

23 Hearing Date: Not Yet Set

24 Hearing Time: Not Yet Set

25 Michael Johnson Investments II, LLC and Ronald L. Kohner (collectively
26 "Respondents"), two members of the "Rev Op Group" of investors, hereby respond to
27 the ML Liquidating Trust's Omnibus Objection to Claims and Motion to Expunge,
28 Reduce or Reclassify Such Claims filed on October 13, 2009 ("Claim Objection").
Through the Claim Objection, the ML Liquidating Trust seeks to reclassify as unsecured
the claims of Respondents. The Claim Objection states that the amount of each claim is
not disputed. Respondents have no objection to their claims being reclassified, provided
that such reclassification does not affect their ownership of the fractional interests in the
mortgage loans acquired from the Debtor. Respondents reserve all rights and legal
arguments with respect to their ownership interests.

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WHEREFORE, Respondents request that any order entered with respect to the Claim Objection specifically provide that such reclassification is without prejudice to Respondents' rights and legal arguments with respect to their ownership interests acquired from the Debtor.

DATED this 16th day of November, 2009.

BRYAN CAVE LLP

By /s/ BAS, #022721
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1 COPY of the foregoing served via
2 email this 16th day of November, 2009,
3 upon:

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17 _____
18 /s/ Sally Erwin

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