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9 UNITED STATES BANKRUPTCY COURT
10 DISTRICT OF ARIZONA

11 In re:

12 MORTGAGES LTD.,
13 Debtor(s).

In Proceedings Under Chapter 11
(Converted from Chapter 7)

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

**RESPONSE TO ML LIQUIDATING
TRUST'S OMNIBUS OBJECTION TO
CLAIMS AND MOTION TO EXPUNGE,
REDUCE OR RECLASSIFY SUCH
CLAIMS
(SCHEDULE G, ENTRY 1416 AND 1285)**

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19 COME NOW Ann Flaherty, individually and for, and on behalf of, Ann Flaherty as
20 Trustee of the Ann H. Flaherty Trust, and Crawford Flaherty, by Stephanie M. Flaherty
21 (collectively "Flaherty") through counsel of record undersigned, hereby responds and objects to
22 ML Liquidating Trust's Omnibus Objection to Claims and Motion to Expunge, Reduce and
23 Reclassify such Claims (the "Objection"). Flaherty asserts that the objection lacks any
24 foundation, is based on unsubstantiated facts and innuendo and clearly reflects a vendetta by the
25 trust against innocent persons while clearly discriminating and ignoring potentially culpable
26 parties situated similarly as Flaherty in their roles as employees of the Debtor.

27 In addition, there is no justification whatsoever for the objection to the Claim filed by
28 Crawford Flaherty, since Crawford Flaherty is a minor and not affiliated with the Debtor.

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Flaherty requests that the relief requested by ML Liquidating Trust be denied in its entirety.

DATED this 20th day of November, 2009.

JABURG & WILK, P.C.

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COPY of the foregoing electronically transmitted to the Clerk's Office using the CM/ECF System for filing.

COPY of the foregoing emailed this 20th day of November, 2009 to the parties on the attached service list.

/s/Julie Irwin
Julie Irwin

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