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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

11 **SUPPLEMENT TO ML MANAGER'S**  
12 **EMERGENCY MOTION FOR ORDER**  
13 **CONTINUING DEADLINES AND HEARING**  
14 **IN FTI FEE APPLICATION**

**Hearing Date:** December 16, 2009

**Hearing Time:** 9:00 a.m.

15 ML Manager LLC ("ML Manager") hereby supplements its Emergency Motion for  
16 Order Continuing Deadlines and Hearing in FTI Fee Application. Attached hereto as  
17 Exhibit A is a 44 page<sup>1</sup> list of all the documents that FTI alleges are in its possession,  
18 custody and control. Attached as Exhibit B is a 104 page<sup>2</sup> list of all of the documents on  
19 FTI's computer system. This list presumably contains much of FTI's alleged work  
20 product even though most of it was never given to the Debtor or ML Servicing Co. (or, in  
21 other words, FTI's client). Both of these lists were produced to the Objectors for the first  
22 time at 7:30 p.m. on December 1, 2009. FTI has indicated that it will allow inspection of  
23 these documents to occur on December 8, 2009, but not before. Neither ML Manager nor

24  
25 <sup>1</sup> In its original format, the list was 44 pages long. To conserve space, the list has been reduced to  
two pages per sheet, and copied front and back.

26 <sup>2</sup> In its original format, the list was 104 pages long. To conserve space, the list has been reduced  
to two pages per sheet, and copied front and back.

1 the other Objectors, including ML Servicing Co., FTI's client, has had the opportunity to  
2 review the vast majority of these documents that constitute FTI's file, records and work  
3 product. Obviously, there are a substantial amount of documents relevant to the issue of  
4 the reasonableness of FTI's fees that the Objectors have not yet had the opportunity to  
5 review. Accordingly, ML Manager respectfully requests that the Court continue the  
6 hearing and extend the date for filing a joint pretrial statement.

7 DATED: December 2, 2009

8 FENNEMORE CRAIG, P.C.

9 By           /s/ Cathy L. Reece            
10 Cathy L. Reece  
11 Keith L. Hendricks  
12 Attorneys for ML Manager LLC

11 COPY of the foregoing emailed  
12 to the parties on the Service List.

13           /s/ Gidget Kelsey-Bacon          

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15 2262580

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