

1 ILENE J. LASHINSKY (#003073)  
2 United States Trustee  
3 District of Arizona

4 LARRY L. WATSON (CA Bar #193531)  
5 230 North First Avenue, Suite 204  
6 Phoenix, Arizona 85003-1706  
7 602-682-2600

8 **IN THE UNITED STATES BANKRUPTCY COURT**  
9 **FOR THE DISTRICT OF ARIZONA**

10 In re:  
11 MORTGAGES LTD.,  
12 Debtor.

In Proceedings Under Chapter 11  
Case No. 2-08-bk-07465-RJH

**STIPULATED MOTION FOR ORDER  
TO RESCHEDULE EVIDENTIARY  
HEARING AND REVISING  
DISCOVERY SCHEDULE RE:**

**SECOND INTERIM AND FINAL  
AMENDED APPLICATION FOR  
ALLOWANCE AND PAYMENT OF  
FEES FOR SERVICES RENDERED  
AND EXPENSES INCURRED BY  
GREENBERG TRAUIG, LLP**

**(Relates to Docket No. 1800)**

**Requested Hearing Date**

**Date: May 11, 2010  
Time: 9:00 a.m.  
Location: Courtroom 603**

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21 Greenberg Traurig LLP ("GT"), the United States Trustee, Kevin T. O'Halloran,  
22 Liquidating Trustee of Mortgages, Ltd., ML Manager LLC in its separate capacity and as  
23 assignee to the claims of the Grace Entities of Central & Monroe, LLC, Osborn III  
24 Partners, LLC, 44<sup>th</sup> & Camelback Property, LLC, 70<sup>th</sup> Street Properties, LLC, and Portales  
25 Place Property, LLC (collectively with GT, the "Parties") respectfully request that the  
26 Court vacate the 9:00 a.m. March 9, 2010 hearing regarding the *Second Interim and Final  
Amended Application for Allowance and Payment of Fees for Services Rendered and*

1 *Expenses Incurred by Greenberg Traurig, LLP* (the "GT Fee Application"), filed on June  
2 12, 2009 [Docket Number 1800], and set the evidentiary hearing on the GT Fee  
3 Application to be held May 11, 2010 at 9:00 a.m..

4 The Parties also request the Court to set the following discovery schedule:

5  
6 **April 6, 2010** Disclosure of Experts (not the exchange of expert  
7 reports)  
8 **April 27, 2010** Conclude Discovery, including experts  
9 **May 4, 2010** Joint Pretrial Statements and Pretrial Memorandum (if  
10 any)  
11 **May 11, 2010** Evidentiary Hearing.

12 A proposed form of Order is attached hereto and was lodged concurrently herewith  
13 for the Court's consideration.

14 RESPECTFULLY SUBMITTED this 11th day of February, 2010.

15 **GREENBERG TRAUIG, LLP**

16 By: \_\_\_\_\_  
17 Garland A Brown, Jr.

15 **UNITED STATES TRUSTEE**

16 By:   
17 Larry L. Watson, Trial Attorney

18 **STRADLEY RONON STEVENS &  
19 YOUNG**

20 By: /s/ Michael D. O'Mara  
21 Michael D. O'Mara/Mark J. Dorval  
22 Counsel for Kevin T. O'Halloran,  
Liquidating Trustee for Mortgages, Ltd.

18 **FENNEMORE CRAIG, P.C.**

19 By: /s/ Keith L. Hendricks  
20 Cathy L. Reece\Keith L. Hendricks  
21 Counsel for ML Manager, LLC and  
22 assignee of claims of Grace Entities

23 **DeCONCINI McDONALD YETWIN &  
24 LACEY, P.C.**

25 By: /s/ Shelton L. Freeman  
26 Shelton L. Freeman  
Special Counsel for G. Grant Lyon,  
Ch. 11 Trustee for Radical Bunny, L.L.C.

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By: \_\_\_\_\_  
Cathy L. Reece\Keith L. Hendricks  
Counsel for ML Manager, LLC and  
assignee of claims of Grace Entities

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