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11 **UNITED STATES BANKRUPTCY COURT**

12 **THE DISTRICT OF ARIZONA**

13 In re:

14 MORTGAGES LTD.,

15 Debtor.

No. 2-08-bk-07465-RJH

CHAPTER 11

STIPULATED MOTION TO CONTINUE HEARING ON FTI CONSULTING, INC.'S MOTION FOR ORDER PURSUANT TO BANKRUPTCY RULE 3020 REQUIRING SEGREGATION OF FUNDS AND COMPLIANCE WITH CONFIRMED PLAN OF REORGANIZATION

DATE: February 18, 2010

TIME: 1:30 p.m.

LOCATION: 230 North First Avenue

Phoenix, Arizona

Courtroom 603, 6th Floor

23 FTI Consulting Inc. ("FTI"), ML Manager LLC, ML Liquidating Trust (the "Liquidating
24 Trust"), and G. Grant Lyon, in his capacity as duly appointed Chapter 11 Trustee for Radical Bunny,
25 L.L.C. (collectively, the "Parties"), jointly move the Court for an order continuing the hearing currently
26 scheduled on February 18, 2010 on FTI's *Motion for Order Pursuant to Bankruptcy Rule 3020*

1 *Requiring Segregation of Funds and for Compliance With Confirmed Plan of Reorganization* (the "3020
2 Motion") [DE2556] to February 25, 2010 at 11:00 a.m. to be heard immediately after the *Joint Motion to*
3 *Sell Real Property Free and Clear of Liens, Claims, Encumbrances and Interests (Real Property*
4 *Known as Chateaux on Central)* (the "Motion to Sell") [DE2619].

5 The Parties jointly request the continuance because the Liquidating Trust anticipates that,
6 at the conclusion of the hearing on the Motion to Sell, the Liquidating Trust will be in a position to
7 unconditionally accept the settlement that the Parties placed on the record on January 27, 2010 (the
8 "Settlement").

9 If for whatever reason the Liquidating Trust is unable to unconditionally accept the terms
10 of the Settlement on February 25, 2010, the Parties will jointly ask that the Court immediately proceed
11 to consider the 3020 Motion on the merits.

12 The Parties further jointly request that the Court authorize and direct an additional
13 interim payment to FTI in the amount of \$200,000, which amount shall also constitute the initial
14 payment required under the proposed Settlement, should it become effective.

15 A proposed form of order is respectfully submitted herewith.

16 DATED this 18th day of February, 2010.

17 SCHIAN WALKER, P.L.C.

18
19 By /s/ DALE C. SCHIAN, #010445
20 Dale C. Schian
21 Michael R. Walker
22 Attorneys for FTI Consulting, Inc.

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