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Donna L. Kramer

**UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF  
ARIZONA**

**In re:**

**Mortgages, Ltd.,**

Debtor.

Chapter 11

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

**STIPULATION FOR  
RESPONSES TO COMPLAINT  
AND RELATED BRIEFING;  
TIME TO FILE REMAND  
MOTION AND RELATED  
BRIEFING; PLAINTIFF'S**

**TIME TO FILE RULE  
9027(e)(3) STATEMENT;  
OTHER MATTERS**

**(The Honorable Randolph J.  
Haines)**

On July 2, 2010, defendants CBIZ, Inc., CBIZ MHM, LLC, Mayer Hoffman McCann PC, Charles A. and Eileen M. McLane, and Joel B. and Donna L. Kramer, together with defendants Greenberg Traurig LLP, Robert S. and Ellen P. Kant, and Jeffrey H. Verbin (collectively, “Defendants”) removed the case of *Victims Recovery, LLC v. Greenberg Traurig, LLP, et al*, (the “VR Action”) from the Superior Court of Arizona, County of Maricopa, to this Court. Plaintiff Victims Recovery, LLC (“Plaintiff”) and removing Defendants in the VR Action now hereby stipulate, and respectfully request that the Court by its Order confirm, the following:

Motions to Dismiss Briefing Schedule

1. The Defendants’ respective responses to Plaintiff’s Complaint shall be filed on or before August 19, 2010.
2. To the extent any Defendants file a motion to dismiss, Plaintiff’s briefs in opposition shall be filed on or before September 20, 2010.
3. Defendants’ reply briefs in support of any motions to dismiss shall be filed on or before October 4, 2010.

Motion to Remand Briefing Schedule

4. Any motion to remand by Plaintiff shall be filed on or before August 16, 2010.

5. Defendants' briefs in opposition to any motion to remand shall be filed by September 15, 2010.

6. Plaintiff's reply briefs in support of any motion to remand shall be filed by September 29, 2010.

Plaintiff's Bankruptcy Rule 9027(e)(3) Statement

7. Plaintiff's Federal Rule of Bankruptcy Procedure 9027(e)(3) statement shall be filed on or before August 16, 2010.

Other Matters

8. Pursuant to Arizona Bankruptcy Local Rule 9027-1(e), Plaintiff hereby demands a jury trial.<sup>1</sup>

9. By entering into this Stipulation, Plaintiff does not waive its rights to contest the removal of this action to this Court or this Court's jurisdiction, or Plaintiff's right to seek to have this case adjudicated in the District Court if it is not remanded to the Superior Court.

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<sup>1</sup> Defendants do not stipulate or concede that Plaintiff is entitled to a jury trial.

Dated: July 13, 2010

Respectfully submitted,  
s/William A. Miller

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s/ Ellen Oberwetter

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**UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF  
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**In re:**

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Chapter 11

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

**[PROPOSED] ORDER ON  
RESPONSES TO COMPLAINT  
AND RELATED BRIEFING;  
TIME TO FILE REMAND  
MOTION AND RELATED  
BRIEFING; PLAINTIFF'S  
TIME TO FILE RULE  
9027(e)(3) STATEMENT**

**(The Honorable Randolph J.  
Haines)**

Pursuant to the stipulation of plaintiff Victims Recovery, LLC (“Plaintiff”) and defendants CBIZ, Inc. CBIZ MHM, LLC, Mayer Hoffman McCann PC, Charles A. and Eileen M. McLane, Joel B. and Donna L. Kramer, Greenberg Traurig LLP, Robert S. and Ellen P. Kant, and Jeffrey H. Verbin (collectively “Defendants”), the Court Orders the following:

Motions to Dismiss Briefing Schedule

1. The Defendants’ respective responses to Plaintiff’s Complaint shall be filed on or before August 19, 2010.
2. To the extent any Defendants file a motion to dismiss, Plaintiff’s briefs in opposition shall be filed on or before September 20, 2010.

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Motion to Remand Briefing Schedule

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Plaintiff's Bankruptcy Rule 9027(e)(3) Statement

7. Plaintiff's Federal Rule of Bankruptcy Procedure 9027(e)(3) statement shall be filed on or before August 16, 2010.

It is so Ordered this \_\_\_ day of July, 2010.

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Hon. Randolph J. Haines

**CERTIFICATE OF SERVICE**

I hereby certify that on July 13, 2010, I electronically filed the foregoing Stipulation and Proposed Order with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties.

s/

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One of the Attorneys for CBIZ, Inc., CBIZ  
MHM, LLC, Mayer Hoffman McCann PC,  
Charles A. and Eileen M. McLane, and Joel B.  
and Donna L. Kramer