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8 Trustee of Radical Bunny, L.L.C.

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

10 In re:
11 MORTGAGES LTD.,
12
13
14 Debtor.

Chapter 11
Case No. 2:08-bk-07465-RJH

**MOTION TO EXCEED PAGE LIMIT RE:
RADICAL BUNNY'S MEMORANDUM IN
SUPPORT OF APPLICATION PURSUANT
TO 11 U.S.C. § 503(b)(3)(D) AND (4) FOR
ALLOWANCE AND PAYMENT OF
ADMINISTRATIVE CLAIM OF CREDITOR
RADICAL BUNNY ON REMAND AFTER
APPEAL**

**Hearing Date: December 6, 2010
Hearing Time: 10:00 a.m.
Location: 230 N. First Ave.,
6th Fl. Courtroom 603,
Phoenix, AZ**

Related Docket Nos.: 1888, 2014, 2027,
2088, 2395, 2398 & 2407

23
24 Creditor RADICAL BUNNY, L.L.C. ("RBLLC"), by and through its duly authorized
25 attorneys, respectfully requests that the Court permit it to exceed the page limitation for
26 "motions and the supporting memorandum" set by Local Bankruptcy Rule 9013-1(b) for its
27 "Memorandum in Support of Application Pursuant to 11 U.S.C. § 503(b)(3)(D) and (4) for
28

1 Allowance and Payment of Administrative Claim of Creditor Radical Bunny on Remand
2 After Appeal" (the "Memorandum"). In light of the record in this matter and the remand
3 from the appeal directing more detailed findings, RBLLC has attempted to provide the
4 Court with a thorough analysis of a complex record and various legal authorities. In order
5 to fully brief those matters, it was necessary for RBLLC to exceed the 15 page limit. This
6 rule may not apply because the Memorandum is not a motion or response to a motion.
7 However, to the extent it is applicable to the Memorandum, exclusive of the caption, the
8 signature page, and the mailing list, the Memorandum is approximately 39 pages long. In
9 light of the complexity of the record and the issues presented, and the context of this
10 request for a Substantial Contribution Claim, it is appropriate for the Court to permit
11 RBLLC to exceed the page limit imposed by Local Bankruptcy Rule 9013-1(b).

12
13 WHEREFORE, RBLLC respectfully requests that the Court permit it to file its
14 Memorandum having approximately 39 pages not including the caption, the signature
15 page, and the mailing list.

16 DATED this 18th day of October, 2010.

17 DECONCINI McDONALD YETWIN & LACY, P.C.

18
19 BY /s/ SHELTON L. FREEMAN

20 Shelton L. Freeman
21 Counsel to Radical Bunny, L.L.C. and
22 Special Counsel to G. Grant Lyon, Chapter
23 11 Trustee of Radical Bunny, L.L.C.

24 **COPY** sent via the U.S. Bankruptcy
25 Court's ECF noticing system this
26 18th day of October, 2010.

27 **COPY** served via electronic mail this
28 18th day of October, 2010, to:

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By /s/ Kara Gibson Schrader