

1 Mark J. Dorval
2 Stradley Ronon Stevens & Young, LLP
3 2600 One Commerce Square
4 Philadelphia, PA 19103
5 Telephone: 215-564-8000
6 Mdorval@Stradley.com

7 Attorneys for the ML Liquidating Trust

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

10 In re:
11 MORTGAGES LTD., an Arizona
12 corporation,
13 Debtor.

14 Proceedings Under Chapter 11
15 Case No. 2:08-bk-07465-RJH

16 **MOTION TO EXCEED PAGE LIMIT**
17 **RE: BRIEF ON REMAND IN SUPPORT**
18 **OF THE ML LIQUIDATING TRUST**
19 **OBJECTION TO THE APPLICATION**
20 **PURSUANT TO 11 U.S.C. § 503(b)(3)(D)**
21 **AND (b)(4) FOR ALLOWANCE AND**
22 **PAYMENT OF ADMINISTRATIVE**
23 **CLAIMS OF CREDITOR RADICAL**
24 **BUNNY, LLC**

25 **Hearing Date: December 6, 2010**
26 **Hearing Time: 10:00 a.m.**

27 **RE DOCKET NOS. 1888, 2014, 2027,**
28 **2088, 2395, 2396, 2398 & 2407**

19 The ML Liquidating Trust (“Liquidating Trust”), by and through its counsel
20 Stradley Ronon Stevens & Young, LLP, hereby requests an order from this Court allowing
21 the Liquidating Trust to exceed the page limitation for “motions and supporting
22 memorandum” as set forth in Local Bankruptcy Rule 9013-1(b) for its Brief on Remand in
23 Support of its Objection to the Application Pursuant to 11 U.S.C. § 503(b)(3)(D) and (b)(4)
24 for Allowance and Payment of Administrative Claim of Creditor Radical Bunny, LLC
25 [Docket No. 1888].

26 In order to fully respond to each argument raised in Radical Bunny LLC’s 39-page
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 “Radical Bunny Brief”) and to each finding of fact proposed in the 23-
3 page Findings of Facts and Conclusions of Law attached to the Radical Bunny Brief (the
4 “Radical Bunny Findings of Fact”), the Liquidating Trust was unable to stay within the 15-
5 page limit imposed by the local rule.

6
7 WHEREFORE, the Liquidating Trust therefore respectfully requests that this Court
8 grant its Motion and enter an order permitting the Liquidating Trust to exceed the page
9 limit.

10 DATED this 29th day of November, 2010.

11 STRADLEY RONON STEVENS & YOUNG,
12 LLP

13 By: /s/ Mark J. Dorval

14 Michael J. Cordone

15 Mark J. Dorval

16 Counsel for the Liquidating Trust of
17 Mortgages, Ltd.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 29, 2010, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

John R. Clemency, Esq. Todd A. Burgess, Esq. Greenberg Traurig, LLP 2375 E. Camelback Road, #700 Phoenix, AZ 85015 clemencyj@gtlaw.com burgessst@gtlaw.com Attorney for Mortgage Ltd.	Jonathan E. Hess Larry Watson Office of the U.S. Trustee 230 N. 1st Avenue, Suite 204 Phoenix, AZ 85003-1706 Jon.e.hess@usdoj.gov Larry.watson@usdoj.gov Attorney for: US Trustee	Donald L Gaffney Donald Fredrick Ennis Christopher H. Bayley Snell & Wilmer LLP One AZ Center Phoenix, AZ 85004-2202 dgaffney@swlaw.com dfennis@swlaw.com CBayley@swlaw.com Attorney for: Central & Monroe; KGM Builders; Osborn III Partners
David Wm. Engelman Steven N. Berger Bradley D. Pack Engelman Berger, P.C. 3636 N. Central Avenue, #700 Phoenix, AZ 85012 dwe@engelmanberger.com snb@engelmanberger.com bdp@engelmanberger.com Attorney for: Tempe Land Company	Robert A. Shull Mariscal, Weeks, McIntyre & Friedlander 2901 N. Central, #200 Phoenix, AZ 85012-2705 rob.shull@mwmf.com Attorney for: Artemus Realty Capital and Gold Creek, Inc.	Shelton L Freeman Nancy J. March DeConcini McDonald Yetwin & Lacy 7310 North 16 th Street Phoenix, AZ 85020 tfreeman@dmylphx.com nmarch@dmylphx.com Attorney for: Radical Bunny, LLC
Sean O'Brien Gust Rosenfeld, PLC 201 E. Washington St., #800 Phoenix, AZ 85004-2327 spobrien@gustlaw.com mcnichol@gustlaw.com Attorney for: Larry Lattig, Litigation Trustee	Richard R. Thomas T. Whitney Thomas Sclern Richardson 1640 South Stapley Dr., #205 Mesa, AZ 85204 rthomas@thomas-schern.com twhitney@thomas-schern.com Attorney for: Eva Sperber-Porter, Litchfield Road Associates Limited Partnership, and Baseline & Val Vista Associates Limited Partnership	Daniel P. Collins Collins, May Potenza, Baran & Gillespie 201 North Central Ave., #2210 Phoenix, AZ 85004-0022 dcollins@cmpbglaw.com Attorney for: William Hall
Dennis J. Wickman Seltzer Caplan McMahon Vitek 750 B Street, Suite 2100 San Diego, California 92101 wickham@scmv.com Attorney for: Southwest Value Partners Fund XIV, LP	Jerry L. Cochran Cochran Law Firm, P.C. 2929 E. Camelback, #118 Phoenix, AZ 85016 jcochran@cochranlawfirmpc.com Attorney for: Metropolitan Lofts	Lawrence E. Wilk Jonathan P. Ibsen Jaburg & Wilk, P.C. 3200 North Central Ave, #2000 Phoenix, AZ 85012-2440 lew@jaburgwilk.com jpi@jaburgwilk.com Attorney for: Laura Martini

1 2 3 4 5	Kevin J. Blakley Gammage & Burnham, P.L.C. Two North Central Avenue, 18 th F1 Phoenix, AZ 85004 Kblakley@gblaw.com Attorney for: Ronald L. Kohner	Gerald K. Smith Lewis and Roca LLP 40 N. Central Ave., #1900 Phoenix, AZ 85004-4429 gsmith@lrlaw.com Attorney for: the Estate Scott M. Cole and Trustee of the SMC Revocable Trust U/T/A	Terry A. Dake Terry A. Dake, Ltd. 11811 North Tatum Blvd, #3031 Phoenix, AZ 85028-1621 Tdake@cox.net Attorney for: Penny Hardaway Investments
6 7 8 9 10	Rebecca J. Winthrop Ballard Spahr Andrews & Ingersoll, LLP 2029 Century Park East, #800 Los Angeles, CA 90067-2909 winthropr@ballardspahr.com Attorney for: University & Ash, Roosevelt Gateway; Roosevelt Gateway II and KML Development	Dean C. Waldt Ballard Spahr Andrews & Ingersoll, LLP Plaza 1000 — Suite 500 Main Street Voorhees, NJ 08043-4636 waldtd@ballardspahr.com Attorney for: University & Ash, LLC, Roosevelt Gateway, Roosevelt Gateway II and KML Development	Charles A. Lamar Justin C. Lamar 818 North First Street Phoenix, AZ 85004 clamar@kmldevelopment.com jlamar@kmldevelopment.com Attorney for: University & Ash; Roosevelt Gateway, Roosevelt Gateway II and KML Development
11 12 13 14 15	Ryan W. Anderson Guttilla Murphy Anderson, PC 4150 West Northern Avenue Phoenix, AZ 85051 randerson@gamlaw.com Attorney for: Department of Financial Institutions	Jerome K. Elwell Warner Angle 3550 N. Central, #1500 Phoenix, AZ 85012 jelwell@warnerangle.com Attorney for: Francine Haraway	C. Taylor Ashworth Alissa C. Lacey Stinson Morrison Hecker LLP 1850 N. Central Ave., #2100 Phoenix, AZ 85004 tashworth@stinson.com alacey@stinson.com Attorney for: Oxford & Investor Group
16 17 18 19 20 21 22 23	Felecia A. Rotellini Robert Charlton AZ Dept. of Financial Institutions 2910 N. 44 th St., Suite 310 Phoenix, AZ 85018 Rotellini@azdfi.gov rcharlton@azdfi.gov	William J. Maledon John L. Blanchard James E. Cross Warren J. Stapleton Osborn Maledon 2929 N. Central Ave., #2100 Phoenix, AZ 85012 wmaledon@omlaw.com jblanchard@omlaw.com jcross@omlaw.com wstapleton@omlaw.com Attorney for: Rightpath Limited Development Group, LLC	Christopher S. Reeder Yaw-Jiun Wu Sheppard, Mullin, Richter & Hampton 333 South Hope St., 48 th Floor Los Angeles, CA 90071 creeder@sheppardmullin.com gwu@sheppardmullin.com Attorney for: Right Path
24 25 26 27 28	C. Bradley Vynalek Quarles & Brady LLP One Renaissance Square 2 North Central Avenue Phoenix, AZ 85004 bvynalek@quarles.com Attorney for: Ashley Coles	Craig A. Raby Office of the Attorney General 1275 W. Washington Phoenix, AZ 85007 craig.raby@azag.gov	Scott A. Rose Kerry M. Griggs The Cavanaugh Law Firm 1850 N. Central Ave., #2400 Phoenix, AZ 85004 srose@cavanaghlaw.com kgriggs@cavanaghlaw.com Attorney for: Central PHX Partners

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

<p>Christopher A. LaVoy LaVoy & Chernoff, PC 201 N. Central Avenue, #3300 Phoenix, AZ 85004 cal@lavoychernoff.com Attorney for: Sue Ross and Ted Dodenhoff</p>	<p>Robert J. Spurlock Bonnett, Fairbourn, Friedman & Balint 2901 N. Central Avenue, #1000 Phoenix, AZ 85012-3311 bspurlock@bffb.com Attorney for: Foothills Plaza IV, LLC</p>	<p>S. Cary Forrester Forrester & Worth, PLLC 3636 N. Central Avenue, #700 Phoenix, AZ 85012 scf@fwlawaz.com Attorney for: the Lewis Trust</p>
<p>Sheldon Sternberg 3212 Rainbow Ridge Drive Prescott, AZ 86303 sheldonsternberg@q.com Pro Per</p>	<p>Gerald T. Hickman Jardine, Baker, Hickman & Houston 3300 North Central Ave. #2600 Phoenix, AZ 85012 ghickman@jbhhlaw.com Attorney for: Mayer Hoffman McCann</p>	<p>Philip R. Rudd Ethan B. Minkin Kutak Rock LLP 8601 N. Scottsdale Rd., #300 Scottsdale, AZ 85253 philip.rudd@kutakrock.com ethan.minkin@kutakrock.com Attorney for: AZ Bank & Trust</p>
<p>Christopher S. Reeder Margaret M. Mann Sheppard, Mullin, Richter & Hampton 333 South Hope St., 48th Floor Los Angeles, CA 90071-1448 CReeder@sheppardmullin.com MMann@sheppardmullin.com Attorney for: Rightpath Limited Development Group, Mayland Way Partners; Daniel L. Hendon; Rick L. Burton; Raymond Rodrigues; Robert C. Banovac; Rightpath Limited; and Glendale Jet Center</p>	<p>John J. Dawson John A. Harris Quarles & Brady LLP One Renaissance Square 2 North Central Avenue Phoenix, AZ 85004 jdawson@quarles.com jharris@quarles.com Attorney for: Southwest Value Partners Fund XIV and Southwest Value Partners Finance I</p>	<p>Stanford E. Lerch Anthony E. DePrima Lerch and DePrima PLC 4000 N. Scottsdale Road, #107 Scottsdale, AZ 85251 slerch@ldlawaz.com tdeprima@ldlawaz.com Attorney for: Howard Farkash (Successor TTEE OFT)</p>
<p>Richard H. Herold Hinshaw & Culbertson LLP 3200 N. Central Ave., #800 Phoenix, AZ 85012-2428 rhoherold@hinshawlaw.com Attorney for: Irwin Union Bank</p>	<p>Patrick R. Barrowclough Atkinson, Hamill & Barrowclough PC 3550 N. Central Ave., #1150 Phoenix, AZ 85012 Patrick.Barrowclough@azbar.org Attorney for: Chuck Niday, Trustee for Ross Verne Family Trust</p>	<p>Catherine A. Sims Rose Law Group PC 6613 N. Scottsdale Road, #200 Scottsdale, AZ 85250 csims@roselawgroup.com Attorney for: Kelly Haddad and Navval Haddad, Creditors</p>

By: /s/ Julie M. Murphy