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7 Counsel to 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 Debtor.

Chapter 11

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

**MOTION TO EXCEED PAGE LIMIT RE:  
RADICAL BUNNY'S REPLY TO BRIEF  
ON REMAND IN SUPPORT OF THE ML  
LIQUIDATING TRUST OBJECTION TO  
THE APPLICATION PURSUANT TO 11  
U.S.C. § 503(b)(3)(D) AND (4) FOR  
ALLOWANCE AND PAYMENT OF  
ADMINISTRATIVE CLAIMS OF  
CREDITOR RADICAL BUNNY**

**Hearing Date: December 6, 2010  
Hearing Time: 10:00 a.m.  
Location: 230 N. 1st Ave., 6th Fl.  
Courtroom 603  
Phoenix, AZ**

**Related Docket Nos. 1888, 2014, 2027, 2088,  
2395, 2398, 2407, 2982 & 3004**

23 Creditor RADICAL BUNNY, L.L.C. ("RBLLC"), by and through its duly  
24 authorized attorneys, respectfully requests that the Court permit it to exceed the  
25 page limitation for "motions and the supporting memorandum" set by Local  
26 Bankruptcy Rule 9013-1(b) for "Radical Bunny's Reply to Brief on Remand in  
27 Support of the ML Liquidating Trust Objection to the Application Pursuant to 11  
28 U.S.C. § 503(b)(3)(D) and (4) for Allowance and Payment of Administrative Claim

1 of Creditor Radical Bunny” (the “Reply”). In its response, the Liquidating Trust  
2 makes numerous claims regarding the record in this matter and the remand from  
3 the appeal directing more detailed findings. In its Reply, RBLLC has attempted to  
4 direct the Court with a thorough description of the record and clarify factual  
5 misstatements. In order to fully reply to those matters, it was necessary for RBLLC  
6 to exceed the 15 page limit. The Reply, exclusive of the caption, the signature  
7 page, mailing list and exhibits, is approximately 21 pages long. In light of the  
8 complexity of the record and the issues presented, and the context of this request  
9 for a Substantial Contribution Claim, it is appropriate for the Court to permit RBLLC  
10 to exceed the page limit imposed by Local Bankruptcy Rule 9013-1(b).

11 WHEREFORE, RBLLC respectfully requests that the Court permit it to file its  
12 Reply having approximately 21 pages not including the caption, signature page,  
13 mailing list and exhibits.  
14

15 DATED this 2nd day of December, 2010.

16 DECONCINI MCDONALD YETWIN & LACY, P.C.

17 BY /s/ SHELTON L. FREEMAN

18 Shelton L. Freeman

19 Counsel to Radical Bunny, L.L.C. and  
20 Special Counsel to G. Grant Lyon, Chapter  
21 11 Trustee of Radical Bunny, L.L.C.

22 **COPY** sent via the U.S. Bankruptcy  
23 Court’s ECF noticing system this  
24 2nd day of December, 2010.

25 **COPY** served via electronic mail this  
26 2nd day of December, 2010, to:

27 Sharon B. Shively, Esq.  
28 Sacks Tierney P.A.

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18 By /s/ Kara Gibson Schrader

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