

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 **STIPULATED MOTION TO**
17 **RESCHEDULE HEARING AND**
18 **EXTEND RESPONSE DEADLINES RE:**
19 **MATTERS CONCERNING**
20 **APPLICATION OF RADICAL BUNNY,**
21 **LLC.**

22 (Related to Docket Nos. 3021, 3025, 3058)

23 Current Hearing Date

24 **Date: February 15, 2011**

25 **Time: 3:00 p.m.**

26 **Location: Courtroom 603**

27 Requested Hearing Date

28 **Date: March 1, 2011**

Time: 1:30 p.m.

Location: Courtroom 603

21 Mark J. Dorval of Stradley Ronon Stevens & Young, LLP, on behalf of the ML
22 Liquidating Trust (the "Liquidating Trust"), and Shelton L Freeman, on behalf of
23 DeConcini McDonald Yetwin & Lacy, P.C. ("DMYL"), attorneys for creditor Radical
24 Bunny, L.L.C. ("RBLLC"), respectfully request that the Court vacate the **3:00 p.m.**
25 **February 15, 2011 hearing** on the Liquidating Trust's *Motion for Stay Pending Appeal*
26 *and Motion for Stay of the Supplemental Application of Radical Bunny, LLC Pursuant to*
27 *11 U.S.C. § 503(b)(3)(D) and (4) for Allowance and Payment of the Administrative Claim*
28

734835

1 of *Creditor Radical Bunny* (the “Motion for Stay”) [D.E. 3025], and reschedule the hearing
2 to be held **March 1, 2011 commencing at 1:30 p.m.**, or as soon thereafter as the Court can
3 accommodate (the “Requested Hearing Date”). The rescheduling of the hearing will allow
4 the Liquidating Trust and DMYL to complete settlement discussions between the parties,
5 which discussions have commenced subsequent to the entry of the order scheduling the
6 hearing.

7 The Liquidating Trust and DMYL hereby agree and stipulate that if the Court
8 vacates the 3:00 p.m. February 15, 2011 hearing and grants the Requested Hearing Date,
9 that the deadlines set forth below shall be extended for an additional two weeks as set forth
10 below:

11 (1) The Supplemental Motion of the Liquidating Trust for Discretionary Stay
12 (the “Supplemental Motion”), which is currently due to be filed on February 8, 2011, shall
13 be due on **February 22, 2011**;

14 (2) The Response of RBLLC/DMYL to the Supplemental Motion, which is
15 currently due to be filed on February 11, 2011, shall be due on **February 25, 2011**;

16 (3) Pursuant to Rule 8002(c), the Notice of Appeal with respect to this Court’s
17 Order Granting the *Supplemental Application of Radical Bunny LLC Pursuant to 11 U.S.C.*
18 *§ 503(b)(3)(D) and (4) for Allowance and Payment of Administrative Claim of Creditor*
19 *Radical Bunny, LLC [D.E. 3021]* entered on January 26, 2011 [D.E. 3058], which is
20 currently due on February 9, 2011, shall be due on **February 23, 2011**.

21 The Liquidating Trust and DMYL further agree that the interim stay pending appeal
22 shall remain in effect until the matters described herein are resolved by entry of an order
23 thereon.

24 A proposed form of Order is attached hereto and was lodged concurrently herewith
25 for the Court’s consideration.

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

RESPECTFULLY SUBMITTED this 2nd day of February, 2011.

STRADLEY RONON
STEVENS & YOUNG, LLP

DECONCINI MCDONALD YETWIN &
LACY, P.C..

By /s/ Mark J. Dorval
Mark J. Dorval
Counsel for ML Liquidating Trust,

By /s/ Shelton L. Freeman
Shelton L. Freeman
Counsel for Radical Bunny, LLC

CERTIFICATE OF SERVICE

I, Mark J. Dorval, certify, that on February 2, 2011, I electronically transmitted the attached documents to the Clerk's Office, using the CM/ECF System for filing, which transmitted a Notice of Electronic Filing to the parties in interest via the Court's ECF System, and also served a copy of the documents on the following parties via a separate e-mail:

Shelton L. Freeman, Esq.
DeConcini McDonald Yetwin & Lacy, P.C.
tfreeman@lawdmyl.com
Fax: 480-398-3101
Attorneys for Radical Bunny

Larry L. Watson, Esq.
U.S. Trustee's Office
230 North Central Avenue, #204
Phoenix, Arizona 85003-1706
Fax: 602-514-7270
larry.watson@usdoj.gov

/s/ Mark J. Dorval

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

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

In re:
MORTGAGES LTD., an Arizona
corporation,

Debtor.

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

**ORDER RESCHEDULING HEARING
AND EXTEND RESPONSE DEADLINES
RE: MATTERS CONCERNING
APPLICATION OF RADICAL BUNNY,
LLC.**

(Related to Docket Nos. 3021, 3025, 3058)

Current Hearing Date

**Date: February 15, 2011
Time: 3:00 p.m.
Location: Courtroom 603**

Requested Hearing Date

**Date: March 1, 2011
Time: 1:30 p.m.
Location: Courtroom 603**

THIS MATTER COMES BEFORE THE COURT pursuant to the *Stipulated Motion to Reschedule Hearing and Extend Response Deadlines re: Matters Concerning Fee Application of Radical Bunny, LLC* (the “Stipulation”) filed by Mark Dorval of Stradley Ronon Stevens & Young, LLP, on behalf of the ML Liquidating Trust (the “Liquidating Trust”), and Shelton L Freeman, on behalf of DeConcini McDonald Yetwin & Lacy, P.C. (“DMYL”), attorneys for G. Grant Lyon in his capacity as the duly appointed Chapter 11 Trustee for Radical Bunny, L.L.C. (“RBLLC”). Based on the Stipulation, and good cause

734835

1 appearing,

2 IT IS HEREBY ORDERED that the 3:00 p.m. February 15, 2011 hearing on
3 the Liquidating Trust's *Motion for Stay Pending Appeal and Motion for Stay of the*
4 *Supplemental Application of Radical Bunny, LLC Pursuant to 11 U.S.C. § 503(b)(3)(D)*
5 *and (4) and for Allowance and Payment of Administrative Claim of Creditor Radical*
6 *Bunny* (the "Motion for Stay") [D.E. No. 3025] is vacated and rescheduled for **March 1,**
7 **2011 commencing at 1:30 p.m.;**

8 IT IS HEREBY FURTHER ORDERED that the interim stay pending appeal
9 shall remain in effect until the matters described herein are resolved by entry of an order
10 thereon;

11 IT IS HEREBY FURTHER ORDERED that the following deadlines shall
12 apply:

13 (1) The Liquidating Trust shall file its Supplemental Motion for Discretionary
14 Stay (the "Supplemental Motion") on or before **February 22, 2011;**

15 (2) RBLLC/DMYL shall file its Response to the Supplemental Motion on or
16 before **February 25, 2011;** and

17 (3) Pursuant to Rule 8002(c), the Liquidating Trust shall file any Notice of
18 Appeal with respect to this Court's Order Granting the *Supplemental Application of*
19 *Radical Bunny LLC Pursuant to 11 U.S.C. § 503(b)(3)(D) and (4) for Allowance and*
20 *Payment of Administrative Claim of Creditor Radical Bunny, LLC [D.E. 3021]* entered on
21 January 26, 2011 [D.E. 3058], on or before **February 23, 2011.**

22
23 **SIGNED AND DATED ABOVE**

24
25
26
27
28