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*Attorneys for Michael F. Thomson, Chapter 11 Trustee*

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

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In re:

THE FALLS EVENT CENTER LLC; THE  
FALLS AT GILBERT, LLC; THE FALLS  
AT ST. GEORGE, LLC; THE FALLS AT  
FRESNO, LLC; THE FALLS AT CLOVIS,  
LLC; THE FALLS OF LITTLETON, LLC;  
THE FALLS AT CUTTEN ROAD, LLC;  
THE FALLS AT STONE OAK PARKWAY,  
LLC; THE FALLS AT BEAVERTON, LLC;  
AND THE FALLS AT ROSEVILLE, LLC

Consolidated Debtors.

Bankr. Case Nos.

18-25116; 18-25419; 18-26653; 18-27713;  
18-28140; and 18-27111

(Substantively Consolidated Under Case No.  
18-25116)

Chapter 11

The Honorable R. Kimball Mosier

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**NOTICE OF APPLICATIONS FOR COMPENSATION AND NOTICE OF HEARING**

**Objection Deadline: May 9, 2019**  
**Hearing Date: May 21, 2019 at 11:00 a.m. (Mountain)**

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**PLEASE TAKE NOTICE** that the following applications for compensation were filed on April 15, 2019 (collectively, the "Applications"):

- (1) *First Application of Michael F. Thomson, Chapter 11 Trustee, for Interim Compensation Pursuant to 11 U.S.C. §§ 326, 330, 331 and 503, and Fed. R. Bankr. P. 2002 and 2016 (November 27, 2018 through March 31, 2019) [Docket No. 402] (the "Trustee Application)");*
- (2) *First Interim Application of Dorsey & Whitney LLP, Counsel for the Chapter 11 Trustee for Compensation and Reimbursement of Expenses Pursuant to 11 U.S.C. §§ 330, 331, and 503, and Fed. R. Bankr. P. 2002 and 2016 (November 27, 2018 through March 31, 2019) [Docket No. 401] (the "Dorsey Application)");*

- (3) *First Interim Application of Trustee's Accountant for Allowance of Compensation as an Administrative Expense* (the "RMA Application") [Docket No. 399]; and
- (4) *First and Final Applications by The Claro Group, LLC for Compensation for the Period December 13, 2018 through March 31, 2019* [Docket No. 400] (the "Claro Application").
- (5) *Second Interim Fee Application of Holland & Hart LLP, Counsel for Official Committee of Unsecured Creditors, For Allowance of Compensation and Reimbursement of Expenses (November 27, 2018 through March 31, 2019)* [Docket No. 397] (the "H&H Application")

If you have not received copies of the Applications and you would like copies, please contact Michelle Montoya at: montoya.michelle@dorsey.com, or you can obtain copies through the Court's PACER service. All of the Applications seek fees and expenses for the period of November 27, 2018 through March 31, 2019 (the "Application Period").

**YOUR RIGHTS MAY BE AFFECTED.** You should carefully read this Notice, as well as the Applications, and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

**PLEASE TAKE FURTHER NOTICE** that:

- (1) Pursuant to the Trustee Application, Michael F. Thomson, the duly appointed Chapter 11 Trustee (the "Trustee") for The Falls Event Center LLC, seeks allowance of his fees incurred on behalf of the consolidated estate for the Application Period in the total amount of \$111,758.50 pursuant to 11 U.S.C. § 330, which, based on distributions made to date in this case, permits the Trustee to take a commission calculated under 11 U.S.C. § 326 in the amount of \$104,126.37;
- (2) Pursuant to the Dorsey Application, Dorsey & Whitney LLP, which serves as counsel to the Trustee, seeks allowance of its fees totaling \$238,298.75 and out-of-pocket expenses totaling \$7,289.96 incurred on behalf of the consolidated estate during Application Period pursuant to 11 U.S.C. § 330;
- (3) Pursuant to the RMA Application, Rocky Mountain Advisory, LLC, which serves as accountant to the Trustee, seeks compensation totaling \$118,255.00 and expenses totaling \$60.96 incurred on behalf of the consolidated estate during the Application Period pursuant to 11 U.S.C. § 330;
- (4) Pursuant to the Claro Application, The Claro Group, LLC, which serves as consultants to the Trustee, seeks compensation totaling \$124,500.00 and expenses totaling \$6,000.00 incurred on behalf of the consolidated estate during the Application Period pursuant to 11 U.S.C. § 330; and

- (5) Pursuant to the H&H Application, Holland & Hart LLP, which serves as counsel for Official Committee of Unsecured Creditors, seeks compensation totaling \$30,155.40 and expenses totaling \$1,176.50 incurred on behalf of the estate during the Application Period pursuant to 11 U.S.C. § 330.

**PLEASE TAKE FURTHER NOTICE** that if you do not want the Court to grant the relief requested in the Applications, or if you want the Court to consider your views on the Applications, then you or your attorney must do the following:

- (1) On or before **May 9, 2019**, file a written objection explaining your position, which must be filed with the Court electronically, by mail, or by hand-delivery at:

Clerk of the Court  
United States Bankruptcy Court  
350 South Main Street, Room 301  
Salt Lake City, UT 84101

If you mail your objection to the Court for filing, you must mail it early enough so that the Court will **receive it on or before May 9, 2019**. You must also mail a copy to:

(a) the undersigned counsel at 111 South Main Street, 21st Floor, Salt Lake City, UT 84111-2176; and (b) Holland & Hart LLP, Attn: Doyle S. Byers, 222 S. Main Street, Suite 2200, Salt Lake City, UT 84101.

(2) Attend the hearing on the Motion at **11:00 am Mountain Time on May 21, 2019**, before the Honorable R. Kimball Mosier, Chief United States Bankruptcy Judge, in his courtroom, Room 369, of the Frank E. Moss United States Courthouse, 350 South Main Street, Salt Lake City, Utah 84101. Failure to attend the hearing will be deemed a waiver of your objection.

If you or your attorney do not take these two steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Applications and may enter an order granting that relief. In the absence of a timely filed objection, the undersigned may and will ask the Court to strike the hearing and enter an order approving the Applications without hearing.

DATED this 22nd day of April 2019.

**DORSEY & WHITNEY LLP**

/s/ Peggy Hunt  
Michael F. Thomson  
Peggy Hunt  
*Attorneys for Chapter 11 Trustee*