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*Attorneys for Michael F. Thomson, Chapter 11 Trustee of The Falls Event Center LLC*

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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 CLOVIS, LLC; THE FALLS AT FRESNO, LLC; THE FALLS AT GILBERT, LLC; THE FALLS AT MCMINNVILLE, LLC; THE FALLS AT ST. GEORGE, LLC; *and* THE FALLS OF LITTLETON, LLC,

Debtors.

Bankr. Case No. 18-25116  
Bankr. Case No. 18-28140  
Bankr. Case No. 18-27713  
Bankr. Case No. 18-25419  
Bankr. Case No. 18-25492  
Bankr. Case No. 18-26653  
Bankr. Case No. 18-27111

Chapter 11

The Honorable R. Kimball Mosier

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**CHAPTER 11 TRUSTEE’S MOTION TO SUBSTANTIVELY CONSOLIDATE THE FALLS EVENT CENTER LLC WITH DEBTORS THE FALLS AT CLOVIS, LLC, THE FALLS AT FRESNO, LLC, THE FALLS AT GILBERT, LLC, THE FALLS AT MCMINNVILLE, LLC, THE FALLS AT ST. GEORGE, LLC, AND THE FALLS OF LITTLETON, LLC; *and* NON-DEBTORS THE FALLS AT AUSTIN BLUFFS, 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**

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Pursuant to 11 U.S.C. § 105(a), Michael F. Thomson, the duly appointed Chapter 11 Trustee (the “Trustee”) for The Falls Event Center LLC (“TFEC”), hereby requests that the

Court enter an *Order* substantively consolidating TFEC with debtors The Falls at Clovis, LLC, The Falls at Fresno, LLC, The Falls at Gilbert, LLC, The Falls at McMinnville, LLC, The Falls at St. George, LLC, and The Falls of Littleton, LLC; *and* non-debtors The Falls at Austin Bluffs, 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 as of July 11, 2018, the date that TFEC filed its Chapter 11 case. This Motion is supported by a *Memorandum of Law*, the *Declaration of Michael F. Thomson*, as Trustee for TFEC, and the *Declaration of Gil A. Miller*, all of which are filed concurrently herewith.

WHEREFORE, for the reasons set forth in the Memorandum of Law, the Trustee respectfully requests that the Court enter an Order as requested herein. Notice of the Motion will be served on all creditors and parties in interest of TFEC as well as all of its affiliated companies.

DATED: February 15, 2019

DORSEY & WHITNEY LLP

/s/ Peggy Hunt

Peggy Hunt

Jessica McKinlay

*Attorneys for Michael F. Thomson, Chapter 11 Trustee of The Falls Event Center*