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

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

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

**NOTICE OF 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 AND NOTICE OF HEARING**

(Objection Deadline: March 8, 2019)

(Hearing Date: March 18, 2019)

NOTICE is hereby given that Michael F. Thomson, the duly appointed Chapter 11 Trustee (the “Trustee”) for The Falls Event Center LLC (“TFEC”), which is the sole member of the other above-captioned debtors, as well as 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, has filed with the United States Bankruptcy Court, District of Utah, the 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 (the “Motion”). The Motion seeks to substantively consolidate TFEC with the above-referenced entities as of July 11, 2018, which is the day TFEC filed its bankruptcy petition. The Motion may be reviewed at the Office of the Clerk, 350 Main Street, Room 301, Salt Lake City, Utah from 8:00 a.m. to 4:30 p.m. on weekdays, excluding holidays. Copies of the Motion, the memorandum in support of the Motion, and the declarations in support of the Motion may be obtained from the undersigned attorney upon request.

YOUR RIGHTS MAY BE AFFECTED. You should read this notice carefully and discuss it with your attorney, if you have one in this case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then you or your attorney must:

(1) On or before **March 8, 2019 at 4:30 p.m., Mountain Time** (the “Objection Deadline”), file a written objection specifically delineating the nature of your objection at:

Clerk of the 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 the Objection Deadline specified above. You must also serve a copy on the Movant’s counsel at the address specified above.

(2) Attend a hearing on **March 18, 2019, at 10:00 a.m. (Mountain Time)** 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 steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting the relief requested in the Motion. In the absence of a timely filed objection, the undersigned counsel may and will ask the Court to enter an order approving the Motion without a hearing.

DATED: February 19, 2019

DORSEY & WHITNEY LLP

/s/ Peggy Hunt

Peggy Hunt

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