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*Counsel for the Debtors-in-Possession*

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH  
CENTRAL DIVISION

<p>In re:</p> <p>THE FALLS EVENT CENTER LLC, THE FALLS AT MCMINNVILLE, LLC, THE FALLS AT ST. GEORGE, LLC, THE FALLS AT FRESNO, LLC THE FALLS AT BRICKTOWN, LLC, THE FALLS AT CLOVIS, LLC, fdba EFALLS PROPERTIES CLOVIS CA, LLC</p> <p>Debtors-in-Possession.</p>	<p>Bankruptcy Case No. 18-25116 Bankruptcy Case No. 18-25492 Bankruptcy Case No. 18-26653 Bankruptcy Case No. 18-27713 Bankruptcy Case No. 18-27766 Bankruptcy Case No. 18-28140</p> <p>Chapter 11</p> <p>Chief Judge R. Kimball Mosier</p> <p>[Filed via ECF]</p>
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**NOTICE OF APPLICATION AND AMENDED APPLICATION OF THE DEBTORS  
FOR ENTRY OF ORDERS AUTHORIZING THE DEBTORS TO RETAIN AND  
EMPLOY JONES LANG LASALLE AMERICAS, INC. AS REAL ESTATE BROKER**

**AND NOTICE OF OPPORTUNITY TO OBJECT AND FOR A HEARING**

**Objection deadline: November 26, 2018  
Reserved Hearing date: December 4, 2018 at 3:00 p.m.**

**PLEASE TAKE NOTICE** that on October 29, 2018, The Falls Event Center, LLC, the Debtor-in-Possession in Chapter 11 Case No. 18-25116; The Falls at McMinnville, LLC, the Debtor-in-Possession in Chapter 11 Case No. 18-25492; The Falls at St. George, LLC, the Debtor-in-Possession in Chapter 11 Case No. 18-26653; The Falls at Fresno, LLC, the Debtor-in-Possession in Chapter 11 Case No. 18-27713; and The Falls at Bricktown, LLC, the Debtor-in-Possession in Chapter 11 Case No. 18-27766 (collectively referred to herein as the “**Debtors**”), filed their *Application of the Debtors for Entry of Orders Authorizing the Debtors to Retain and Employ Jones Lang LaSalle Americas, Inc. as Real Estate Broker* (the “**Application**”) requesting entry of this Court’s Orders in each of the Chapter 11 cases outlined above (collectively the “**Cases**”) authorizing the Debtors to retain and employ Jones Lang LaSalle Americas, Inc. (“**JLL**”) as the Debtors’ real estate broker in accordance with 11 U.S.C. § 327 and Fed. R. Bankr. P. 2014.

**PLEASE TAKE FURTHER NOTICE** that on November 7, 2018, the Debtors filed an *Amended Application of the Debtors for Entry of Orders Authorizing the Debtors to Retain and Employ Jones Lang LaSalle Americas, Inc. as Real Estate Broker* (the “**Amended Application**”). The Amended Application was filed in order to add Debtor, The Falls at Clovis LLC, the Debtor-in-Possession in Chapter 11 Case No. 18-28140, and to delete the Fresno raw ground property as one of the proposed sale properties in the original Application filed on October 29, 2018.

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THE AMENDED APPLICATION CAREFULLY, AND DISCUSS IT WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE).**

The services of a real estate broker are necessary to assist the Debtors to list for sale, market and potentially sell the real property assets of each of the Debtors as outlined in the Amended Application. JLL is a nationally recognized real estate brokerage firm with offices and operations in many parts of the United States which will greatly facilitate the efforts to sell the properties owned by each Debtor which are located in six different states (i.e., Utah, Oregon, Oklahoma, Illinois, California and Texas).

**PLEASE TAKE FURTHER NOTICE THAT** the Application and the Amended Application are on file with the Clerk of the United States Bankruptcy Court for the District of Utah, United States Courthouse, 350 South Main, Room 301, Salt Lake City, Utah 84101, and may be reviewed at that address during regular business hours. A copy of the Application and Amended Application may also be obtained by contacting legal counsel for the Debtors, Michael R. Johnson or David H. Leigh, Ray Quinney & Nebeker P.C., at 801-532-1500, or by e-mail at [mjohnson@rqn.com](mailto:mjohnson@rqn.com) or [dleigh@rqn.com](mailto:dleigh@rqn.com) **with** a copy of the email request to Dianne Burton at [dburton@rqn.com](mailto:dburton@rqn.com).

**NO HEARING WILL BE CONDUCTED ON THE AMENDED APPLICATION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE COURT ON OR BEFORE THE OBJECTION DEADLINE SET FORTH BELOW.**

If you do not want the Court to grant the relief requested in the Amended Application then you or your attorney must take the following steps:

A. On or before **November 26, 2018**, file with the Bankruptcy Court a written response to the Amended Application explaining your position. Your written objection must be filed electronically, by mail or by hand-delivery at:

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

If you mail your written response to the Bankruptcy Court for filing, you must mail it early enough so that the court will **receive it** on or before the date stated above. You must also mail to or otherwise serve a copy of your written response to the undersigned at Ray Quinney & Nebeker P.C., 36 South State Street, Suite 1400, Salt Lake City, Utah 84111, so that it is **received** on or before the date stated above; **and**

B. Attend the hearing on the Amended Application, which has been reserved for **December 4, 2018 at 3:00 p.m.**, in Room 369 of the United States Courthouse, 350 South Main Street, Salt Lake City, Utah 84101, before the Honorable R. Kimball Mosier, United States Bankruptcy Court for the District of Utah. There will be no further notice of the hearing and failure to attend the hearing will be deemed a waiver of your objection.

**PLEASE TAKE FURTHER NOTICE THAT**, pursuant to Bankr. D. Ut. LBR 9013-2(d)(4), if a timely response or objection to the Amended Application is not filed by the deadline set forth above, the Debtors may and will request the Court to enter Orders in each of the Debtors' cases approving the Amended Application without further notice or hearing.

DATED this 7th day of November, 2018.

RAY QUINNEY & NEBEKER P.C.

/s/ Michael R. Johnson  
Michael R. Johnson  
David H. Leigh  
Brent D. Wride  
Elaine A. Monson  
*General Bankruptcy and Litigation  
Counsel for the Debtors*

**CERTIFICATE OF SERVICE**

I hereby certify that November 7, 2018 I electronically filed the foregoing **NOTICE OF APPLICATION AND AMENDED APPLICATION OF THE DEBTORS FOR ENTRY OF ORDERS AUTHORIZING THE DEBTORS TO RETAIN AND EMPLOY JONES LANG LASALLE AMERICAS, INC. AS REAL ESTATE BROKER AND NOTICE OF OPPORTUNITY TO OBJECT AND OF HEARING** (the “Notice”) with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in each of the Debtors’ cases, including the United States Trustee, are registered CM/ECF users and will be served through the CM/ECF system.

I further certify that on November 7<sup>th</sup>, 2018, I caused the foregoing Notice, along with a copy of the Application and Amended Application referred to in the foregoing Notice, to be mailed to the parties requesting notice that are not on the list to receive email notice as follows:

**Richard N. Bauer**  
1789 Bella Lago Drive  
Clermont, FL 34711-4634

**Albert B Clark**  
696 East 1220 North  
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**Gil Miller**

Rocky Mountain Advisory  
215 South State Street Ste 550  
Salt Lake City, UT 84111

**State of Oregon**

Department of Revenue  
955 Center St NE  
Salem, OR 97301-2555

/s/ Carrie Hurst

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