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Attorneys for Michael F. Thomson, Chapter 11 Trustee

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

In re:

THE FALLS EVENT CENTER LLC,

Debtor.

Bankr. Case No. 18-25116

Chapter 11

The Honorable R. Kimball Mosier

**NOTICE OF MOTION FOR ENTRY OF AN ORDER EXTENDING FOR NINETY (90)
DAYS THE TIME BY WHICH THE DEBTOR MUST ASSUME OR REJECT ANY
UNEXPIRED NON-RESIDENTIAL REAL PROPERTY LEASES PURSUANT TO 11
U.S.C. § 365(d)(4) AND NOTICE OF CONTINUED HEARING**

**Objection Deadline: January 24, 2019
Continued Hearing Date: January 30, 2019 at 1:00 p.m. (Mountain)**

PLEASE TAKE NOTICE that The Falls Event Center LLC (the “Debtor”), filed with the United States Bankruptcy Court for the District of Utah the *Motion for Entry of an Order Extending for Ninety (90) Days the Time By Which the Debtor Must Assume or Reject Any Unexpired Non-Residential Real Property Leases Pursuant to 11 U.S.C. § 365(d)(4)* on November 8, 2018 [Dkt. 196] (the “Motion”). The Motion seeks an Order of the Court, pursuant to 11 U.S.C. § 365(d)(4), extending for ninety (90) days the period during which the Debtor may

assume or reject its unexpired non-residential real property leases. A hearing on this Motion was originally held on December 4th, 2018, but it is was continued in light of the appointment of Michael F. Thomson as Chapter 11 Trustee for the Debtor and to provide notice to parties that may be affected by the relief sought in the Motion.

A copy of the Motion was served electronically via the Court's CM/ECF system or via First Class U.S. Mail on the Office of the United States Trustee and on parties who have entered an appearance in the above-captioned bankruptcy case. If you have not received a copy of the Motion referenced above and you would like one, you may obtain a copy by requesting one from the undersigned counsel.

YOUR RIGHTS MAY BE AFFECTED. You should read the Motion 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.

If you do not want the Court to grant the relief requested in the Motion, then you or your attorney must do the following:

- (1) On or before **January 24, 2019**, file with the Bankruptcy Court a written

Objection explaining your position, at:

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

- (2) If you mail your objection to the Bankruptcy Court for filing, you must mail it early enough so that the Court will **receive** it on or before **January 24, 2019**. You must also mail a copy to the undersigned counsel at 111 South Main Street, Suite 2100, Salt Lake City, Utah 84111.

(3) You must also attend the continued hearing on **January 30, 2019 at 1:00 p.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. **There will be no further notice of the hearing, and failure to attend the hearing will be deemed a waiver of your objection.**

If you or your attorney do not take these steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting that relief. 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 hearing.

DATED this 7th day of January 2019.

/s/ Peggy Hunt
Michael F. Thomson
Peggy Hunt
Megan K. Baker
DORSEY & WHITNEY LLP
Attorneys for Chapter 11 Trustee

CERTIFICATE OF SERVICE, BY NOTICE OF ELECTRONIC FILING

I hereby certify that on the 7th day of January 2019, I electronically filed the **M NOTICE OF MOTION FOR ENTRY OF AN ORDER EXTENDING FOR NINETY (90) DAYS THE TIME BY WHICH THE DEBTOR MUST ASSUME OR REJECT ANY UNEXPIRED NON-RESIDENTIAL REAL PROPERTY LEASES PURSUANT TO 11 U.S.C. § 365(d)(4) AND NOTICE OF CONTINUED HEARING** 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 this case, as identified below, are registered CM/ECF users and will be served through the CM/ECF system.

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