

Oren B. Haker (OSB #130162) (*admitted pro hac vice*)

[oren.haker@stoel.com](mailto:oren.haker@stoel.com)

Mark E. Hindley (UTB #7222)

[mark.hindley@stoel.com](mailto:mark.hindley@stoel.com)

STOEL RIVES LLP

201 South Main Street, Suite 1100

Salt Lake City, Utah 84111

Telephone: (801) 328-3131

Facsimile: (801) 578-6999

*Attorneys for Evergreen Aviation and Space Museum  
and the Captain Michael King Smith Educational Institute*

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

In re:

The Falls Event Center LLC,

Debtor.

Bankr. Case No. 18-25116

Chapter 11

Honorable Chief Judge R. Kimball Mosier

**NOTICE OF MOTION FOR AN ORDER GRANTING  
RELIEF FROM THE AUTOMATIC STAY  
AND RELATED RELIEF AND NOTICE OF HEARING**

PLEASE TAKE NOTICE that Evergreen Aviation and Space Museum and The Captain Michael King Smith Educational Institute (collectively, the “**Museum**”) filed in the United States Bankruptcy Court for the District of Utah a Motion for Relief From Automatic Stay and Memorandum in Support.

**YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully 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.**

The Museum's Motion for Relief from the Automatic Stay requests that the Court grant relief from the automatic stay to (i) foreclose on the revenue stream from the Waterpark's operations; (ii) foreclose on the revenues generated by TFM's use of the Museum Campus; (iii) relief so that the Museum can properly advise the Yamhill County Tax Assessor by April 1, 2019 of its intention not to seek a property tax exemption; (iv) mitigate damages caused by the TFM and TFEC's breach of the Prepetition Transaction Documents (as defined in the Motion); (v) require an accounting by the Trustee of all receipts and disbursements by TFEC relating to revenues generated by, and costs of operating, the Waterpark, and the same for revenue-generating events hosted by TFEC/TFM on the Museum's Campus; and (vi) segregation by the Trustee of income generated from the operations of the Waterpark and revenues generated by TFM's hosting events on the Museum Campus.

If you do not want the Court to grant the relief being requested:

1. On or before **January 29, 2019** you or your lawyer must 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

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 the **Objection Deadline**. You must also mail a copy to the Museum at the address listed at the top of this form; AND

2. Attend a hearing on the matter which is set for the 12th day of February, 2019 at 11:00 a.m. in courtroom 369.

**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 being sought and may enter an order granting that relief. In the absence of a timely filed objection, the Museum may and will ask the Court to enter an order approving the relief without a hearing.

DATED: January 15, 2019

**STOEL RIVES LLP**

*/s/ Oren B. Haker*

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Oren B. Haker (OSB #130162)

*(admitted pro hac vice)*

Mark E. Hindley (UTB #7222)

STOEL RIVES LLP

Suite 1100, One Utah Center

201 South Main Street

Salt Lake City, Utah 84111

Telephone: (801) 328-3131

Facsimile: (801) 578-6999

*Attorneys for Evergreen Aviation and Space  
Museum and The Captain Michael King Smith  
Educational Institute*

### CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of January, 2019 I filed a true and correct copy of the foregoing Notice of Motion for an Order Granting Relief From the Automatic Stay and Related Relief and Notice of 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.

- James W. Anderson jwa@clydesnow.com, jritchie@clydesnow.com; atrujillo@clydesnow.com
- David P. Billings dbillings@fabianvancott.com, jwinger@fabianvancott.com;
- mdewitt@fabianvancott.com
- Ryan C. Cadwallader readwallader@kmclaw.com, tslaughter@kmclaw.com
- Laurie A. Cayton laurie.cayton@usdoj.gov, James.Gee@usdoj.gov; Lindsey.Huston@usdoj.gov; Suzanne.Verhaal@usdoj.gov
- Thomas E. Goodwin tgoodwin@parrbrown.com, nmckean@parrbrown.com
- Oren Buchanan Haker oren.haker@stoel.com, jennifer.lowes@stoel.com; daniel.kubitz@stoel.com; docketclerk@stoel.com; rene.alvin@stoel.com
- Mark E. Hindley mehindley@stoel.com, rross@stoel.com; slcdocket@stoel.com
- Alan C. Hochheiser ahochheiser@mauricewutscher.com
- Mary Margaret Hunt hunt.peggy@dorsey.com, long.candy@dorsey.com
- Michael R. Johnson mjohanson@rqn.com, docket@rqn.com; dburton@rqn.com
- Peter J. Kuhn Peter.J.Kuhn@usdoj.gov, James.Gee@usdoj.gov; Lindsey.Huston@usdoj.gov; Suzanne.Verhaal@usdoj.gov
- David H. Leigh dleigh@rqn.com, dburton@rqn.com; docket@rqn.com
- Ralph R. Mabey rmabey@kmclaw.com
- Jessica G. McKinlay mckinlay.jessica@dorsey.com, Segovia.Maria@dorsey.com
- Elaine A. Monson emonson@rqn.com, docket@rqn.com; pbrown@rqn.com
- John T. Morgan john.t.morgan@usdoj.gov, James.Gee@usdoj.gov; Lindsey.Huston@usdoj.gov; Suzanne.Verhaal@usdoj.gov
- Ellen E Ostrow eostrow@hollandhart.com, intaketeam@hollandhart.com; lahansen@hollandhart.com
- Chad Rasmussen chad@alpinalegal.com, contact@alpinalegal.com
- Michael S. Steck michael@clariorlaw.com
- Mark S. Swan mark@swanlaw.net
- Richard C. Terry richard@tjblawyers.com, cbcecf@yahoo.com
- Michael F. Thomson thomson.michael@dorsey.com, montoya.michelle@dorsey.com; ventrello.ashley@dorsey.com
- Michael F. Thomson thomson.michael@dorsey.com, UT17@ecfcbis.com; montoya.michelle@dorsey.com
- United States Trustee USTPRegion19.SK.ECF@usdoj.gov
- Brent D. Wride bwride@rqn.com, docket@rqn.com; pbrown@rqn.com

I further certify the below parties who are not on the list to receive email notice/service for this case were served by U.S. First Class mail the 15th day of January, 2019.

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

Albert B Clark  
696 East 1220 North  
Orem, UT 84097

Richard W. Johnston  
6855 S. Havana St. #275  
Centennial, CO 80112-3813

Meilin Liu  
2601 Blanding Avenue, C307  
Alameda, CA 94501-1579

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

The Claro Group, LLC  
711 Louisiana Street, Suite 2100  
Houston, TX 77002

DATED: January 15, 2019



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René A. Alvin