

**This order is SIGNED.**

**Dated: April 30, 2019**



**R. KIMBALL MOSIER  
U.S. Bankruptcy Judge**



*Prepared and Submitted By:*

Michael F. Thomson (#9707)  
Peggy Hunt (#6060)  
Jessica G. McKinlay (#11210)  
DORSEY & WHITNEY LLP  
111 South Main Street, 21st Floor  
Salt Lake City, UT 84111-2176  
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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:	Bankr. Case No. 18-25116
THE FALLS EVENT CENTER LLC,	Chapter 11
Debtor.	The Honorable R. Kimball Mosier

**ORDER GRANTING SUPPLEMENTAL APPLICATION OF MICHAEL F. THOMSON, CHAPTER 11 TRUSTEE, FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT OF JONES LANG LASALLE AMERICAS, INC., AND JONES LANG LASALLE BROKERAGE, INC. AS REAL ESTATE BROKER FOR THE TRUSTEE**

The matter before the Court is the *Supplemental Application of Michael F. Thomson, Chapter 11 Trustee for the Bankruptcy Estate of The Falls Event Center LLC, for Entry of an*

*Order Authorizing the Employment of Jones Lang LaSalle Americas, Inc. and Jones Lang LaSalle Brokerage, Inc.* (“JLL”) as Real Estate Broker for the Trustee [Docket No. 386] (the “Application”). The Application was properly served through the Court’s CM/ECF system on all parties that have requested electronic service in this case. In addition, a Notice of Supplemental Application of Michael F. Thomson, Chapter 11 Trustee for the Bankruptcy Estate of The Falls Event Center LLC, for Entry of an Order Authorizing the Employment of Jones Lang LaSalle Americas, Inc. and Jones Lang LaSalle Brokerage, Inc. and Notice of Hearing [Docket No. 388] (the “Notice”) that provided for, among other things, notice of the hearing on the Application and notice of the deadline of April 19, 2019, for filing responses to the Application, was properly served on all parties in interest in this case, and no further notice is required. No responses to the Application have been filed or received by the Trustee or his counsel.

The Court has reviewed the Application, the *Supplemental Declaration of Brian Anderson* filed in support of the Application [Docket No. 387] which was filed in connection with the Application, as well as applicable law. Based thereon, the Court finds that the employment of Jones Lang LaSalle Americas, Inc. and Jones Lang LaSalle Brokerage, Inc. as Real Estate Broker for the Trustee to sell the McMinnville Property is in the best interests of the bankruptcy estate. For these reasons, and for good cause shown,

IT IS HEREBY ORDERED that:

1. The Application is **GRANTED**;

2. The Trustee is authorized under 11 U.S.C. § 327 and Federal Rule of Bankruptcy Procedure 2014 to employ Jones Lang LaSalle Americas, Inc. and Jones Lang LaSalle Brokerage, Inc. as set forth in the Application; and

3. The hearing scheduled for April 30, 2019 at 3:00 p.m. is **STRICKEN**.

-----**END OF ORDER**-----

**DESIGNATION OF PARTIES TO BE SERVED**

Service of the foregoing **ORDER GRANTING SUPPLEMENTAL APPLICATION OF MICHAEL F. THOMSON, CHAPTER 11 TRUSTEE, FOR ENTRY OF AN ORDER FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT OF JONES LANG LASALLE AMERICAS, INC. AND JONES LANG LASALLE BROKERAGE, INC., AS REAL ESTATE BROKER FOR THE TRUSTEE** shall be served to the parties in the manner designated below:

**By Electronic Service:** I certify that the parties of record in this case as identified below, are registered CM/ECF users and will be served notice of entry of the foregoing Order through the CM/ECF system:

- James W. Anderson jwa@clydesnow.com, jritchie@clydesnow.com; atrujillo@clydesnow.com
- Megan K Baker baker.megan@dorsey.com, long.candy@dorsey.com
- David P. Billings dbillings@fabianvancott.com, jwinger@fabianvancott.com; mdewitt@fabianvancott.com
- Aaron T. Brogdon aaron.brogdon@squirepb.com, christopher.giaino@squirepb.com
- Doyle S. Byers DSByers@hollandhart.com, BKNoble@hollandhart.com
- Ryan C. Cadwallader rcadwallader@kmclaw.com, tsanders@kmclaw.com
- Laurie A. Cayton tr laurie.cayton@usdoj.gov, James.Gee@usdoj.gov; Lindsey.Huston@usdoj.gov; Suzanne.Verhaal@usdoj.gov
- Micah L. Daines micah@dainesjenkins.com
- Thomas E. Goodwin tgoodwin@parrbrown.com, nmckean@parrbrown.com
- Oren Buchanan Haker oren.haker@stoel.com, kevin.mckenzie@stoel.com; daniel.kubitz@stoel.com; docketclerk@stoel.com; rene.alvin@stoel.com; kc.harding@stoel.com
- Mark E. Hindley mehindley@stoel.com, rross@stoel.com; slcdocket@stoel.com; Dixie.colson@stoel.com
- Alan C. Hochheiser ahochheiser@mauricewutscher.com
- Armand J. Howell armand@hwmlawfirm.com, megan@hwmlawfirm.com; armandh@ecf.courtdrive.com
- Mary Margaret Hunt hunt.peggy@dorsey.com, long.candy@dorsey.com
- Peter J. Kuhn tr Peter.J.Kuhn@usdoj.gov, James.Gee@usdoj.gov; Lindsey.Huston@usdoj.gov; Suzanne.Verhaal@usdoj.gov
- Ralph R. Mabey rmabey@kmclaw.com
- Jessica G. McKinlay mckinlay.jessica@dorsey.com, Segovia.Maria@dorsey.com
- John T. Morgan tr john.t.morgan@usdoj.gov, James.Gee@usdoj.gov; Lindsey.Huston@usdoj.gov; Suzanne.Verhaal@usdoj.gov
- Darren B. Neilson darren@neilsonlaw.co
- Ellen E. Ostrow ellen.ostrow@stoel.com
- Brian J. Porter brian@hwmlawfirm.com
- Chad Rasmussen chad@alpinalegal.com, contact@alpinalegal.com
- Steven M. Rogers srogers@roruss.com, nrussell@roruss.com; rorusslaw@gmail.com; paralegal@roruss.com

- Jeffrey B. Smith jsmith@cgsattys.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 tr thomson.michael@dorsey.com,  
UT17@ecfbis.com; montoya.michelle@dorsey.com
- United States Trustee USTPRegion19.SK.ECF@usdoj.gov
- John J. Wiest wiest.john@dorsey.com

**By U.S. Mail** – In addition to the parties of record receiving notice through the CM/ECF system, the following parties should be served notice pursuant to Fed R. Civ. P. 5(b):

Jones Lang LaSalle Americas, Inc.  
c/o Brian Anderson  
111 South Main Street, Suite 300  
Salt Lake City, Utah 84111

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

Jones Lang LaSalle  
200 East Randolph Drive  
Chicago, IL 60601  
Attention: Regional Counsel

Brent Davies Pulley  
2148 East Caroline Ln  
Tempe, AZ 85284

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

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

Bexar County  
C/o David G. Aevoet  
Linebarger Goggan Blair & Sampson, LLP  
711 Navarro St, Ste 300  
San Antonio, TX 78205

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

Albert B Clark  
696 East 1220 North  
Orem, UT 84097

The Falls Event Center LLC  
9067 South 1300 West, Suite 301  
West Jordan, UT 84088

Christopher J. Giaimo  
Squire Patton Boggs (US) LLP  
2550 M Street, NW  
Washington, DC 20037

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

**Certificate of Notice Page 6 of 7**  
 United States Bankruptcy Court  
 District of Utah

In re:  
 The Falls Event Center LLC  
 Debtor

Case No. 18-25116-RKM  
 Chapter 11

**CERTIFICATE OF NOTICE**

District/off: 1088-2

User: ksh  
 Form ID: pdfor1

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 Total Noticed: 12

Date Rcvd: Apr 30, 2019

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 02, 2019.

db +The Falls Event Center LLC, 9067 South 1300 West, Suite 301, West Jordan, UT 84088-5582  
 aty +Christopher J. Giaimo, Squire Patton Boggs (US) LLP, 2550 M Street, NW,  
 Washington, DC 20037-1350  
 aty +Richard W. Johnston, 6855 S. Havana St. #275, Centennial, CO 80112-4567  
 cr +Albert B Clark, 696 East 1220 North, Orem, UT 84097-3431  
 cr +Bexar County, C/o David G. Aevoet, Linebarger Goggan Blair & Sampson, LLP,  
 711 Navarro St, Ste 300, San Antonio, TX 78205, UNITED STATES 78205-1749  
 cr +Brent Davies Pulley, 2148 East Caroline Ln, Tempe, AZ 85284-3532  
 br +Jones Lang LaSalle Americas, Inc., 200 East Randolph Drive, Attention: Regional Counsel,  
 Chicago, IL 60601-6436  
 cr Meilin Liu, 2601 Blanding Avenue, C307, Alameda, CA 94501-1579  
 cr Richard N. Bauer, 1789 Bella Lago Drive, Clermont, FL 34711-4634  
 11205825 +Jones Lang LaSalle Americas, Inc., c/o Brin Anderson, 111 Main Street, Suite 300,  
 Salt Lake City UT 84111-2182

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

cr +E-mail/Text: bankruptcy.revenue@oregon.gov May 01 2019 01:32:57 State of Oregon,  
 Department of Revenue, 955 Center St NE, Salem, OR 97301-2554  
 fa +E-mail/Text: ddeems@theclarogroup.com May 01 2019 01:32:58 The Claro Group, LLC,  
 711 Louisiana Street, Suite 2100, Houston, TX 77002-2746

TOTAL: 2

\*\*\*\*\* BYPASSED RECIPIENTS (undeliverable, \* duplicate) \*\*\*\*\*

r Jones Lang LaSalle Americas, Inc.

TOTALS: 1, \* 0, ## 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.  
 USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

**I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: May 02, 2019

Signature: /s/Joseph Speetjens

**CM/ECF NOTICE OF ELECTRONIC FILING**

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on April 30, 2019 at the address(es) listed below:

Aaron T. Brogdon on behalf of Interested Party NORTH AMERICAN BANCARD, LLC  
 aaron.brogdon@squirepb.com, christopher.giaimo@squirepb.com  
 Alan C. Hochheiser on behalf of Creditor AmTrust North America, Inc on Behalf of Wesco  
 Insurance Company ahochheiser@mauricewutscher.com  
 Armand J. Howell on behalf of Creditor Abey Baraghoshi, Trustee of the Baraghoshi Family  
 Trust Dated Feb 19, 03 armand@hwmlawfirm.com, megan@hwmlawfirm.com;armandh@ecf.courtdrive.com  
 Brian J. Porter on behalf of Creditor Abey Baraghoshi, Trustee of the Baraghoshi Family Trust  
 Dated Feb 19, 03 brian@hwmlawfirm.com  
 Chad Rasmussen on behalf of Creditor Gregory Steven Moss chad@alpinalegal.com,  
 contact@alpinalegal.com  
 Darren B. Neilson on behalf of Creditor Union Home Loan, Inc. darren@neilsonlaw.co  
 David P. Billings on behalf of Creditor Golf 6061, LLC dbillings@fabianvancott.com,  
 jwinger@fabianvancott.com;mdewitt@fabianvancott.com  
 Doyle S. Byers on behalf of Creditor Committee Official Committee of Unsecured Creditors of  
 The Falls Event Center LLC DSByers@hollandhart.com, BKNoble@hollandhart.com  
 Ellen E. Ostrow on behalf of Creditor Committee Official Committee of Unsecured Creditors of  
 The Falls Event Center, LLC ellen.ostrow@stoel.com  
 Ellen E. Ostrow on behalf of Interested Party Official Committee of Unsecured Creditors for  
 The Falls Event Center LLC ellen.ostrow@stoel.com  
 Ellen E. Ostrow on behalf of Creditor Committee Official Committee of Unsecured Creditors for  
 The Falls Event Center LLC ellen.ostrow@stoel.com  
 James W. Anderson on behalf of Creditor Trolley Square Ventures, LLC jwa@clydesnow.com,  
 jritchie@clydesnow.com;atrujillo@clydesnow.com  
 Jeffrey B. Smith on behalf of Creditor Union Home Loan, Inc. jsmith@cgsattys.com



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Form ID: pdfor1

Page 2 of 2  
Total Noticed: 12

Date Rcvd: Apr 30, 2019

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system (continued)

Jessica G. McKinlay on behalf of Trustee Michael F. Thomson tr mckinlay.jessica@dorsey.com, Segovia.Maria@dorsey.com  
Jessica G. McKinlay on behalf of Interested Party Michael F. Thomson mckinlay.jessica@dorsey.com, Segovia.Maria@dorsey.com  
John J. Wiest on behalf of Trustee Michael F. Thomson tr wiest.john@dorsey.com  
John T. Morgan tr on behalf of U.S. Trustee United States Trustee john.t.morgan@usdoj.gov, James.Gee@usdoj.gov;Lindsey.Huston@usdoj.gov;Suzanne.Verhaal@usdoj.gov  
Laurie A. Cayton tr on behalf of U.S. Trustee United States Trustee laurie.cayton@usdoj.gov, James.Gee@usdoj.gov;Lindsey.Huston@usdoj.gov;Suzanne.Verhaal@usdoj.gov  
Mark E. Hindley on behalf of Creditor Evergreen Aviation & Space Museum mehindley@stoel.com, rross@stoel.com;slcdocket@stoel.com;Dixie.colson@stoel.com  
Mark E. Hindley on behalf of Creditor Evergreen Aviation & Space Museum and the Captain Michael King Smith Educational Institute mehindley@stoel.com, rross@stoel.com;slcdocket@stoel.com;Dixie.colson@stoel.com  
Mark S. Swan on behalf of Creditor West Jordan Gateway, LLC mark@swanlaw.net  
Mary Margaret Hunt on behalf of Trustee Michael F. Thomson tr hunt.peggy@dorsey.com, long.candy@dorsey.com  
Mary Margaret Hunt on behalf of Interested Party Michael F. Thomson hunt.peggy@dorsey.com, long.candy@dorsey.com  
Megan K Baker on behalf of Interested Party Michael F. Thomson baker.megan@dorsey.com, long.candy@dorsey.com  
Megan K Baker on behalf of Trustee Michael F. Thomson tr baker.megan@dorsey.com, long.candy@dorsey.com  
Micah L. Daines on behalf of Creditor Cache Valley Bank, f/k/a The Village Bank micah@dainesjenkins.com  
Michael F. Thomson on behalf of Trustee Michael F. Thomson tr thomson.michael@dorsey.com, montoya.michelle@dorsey.com;ventrello.ashley@dorsey.com  
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Michael F. Thomson tr on behalf of Interested Party Michael F. Thomson thomson.michael@dorsey.com, UT17@ecfcbis.com;montoya.michelle@dorsey.com  
Michael F. Thomson tr on behalf of Trustee Michael F. Thomson tr thomson.michael@dorsey.com, UT17@ecfcbis.com;montoya.michelle@dorsey.com  
Michael F. Thomson tr thomson.michael@dorsey.com, UT17@ecfcbis.com;montoya.michelle@dorsey.com  
Michael S. Steck on behalf of Creditor John C. Neubauer michael@clariorlaw.com  
Oren Buchanan Haker on behalf of Creditor Evergreen Aviation & Space Museum and the Captain Michael King Smith Educational Institute oren.haker@stoel.com, kevin.mckenzie@stoel.com;daniel.kubitz@stoel.com;docketclerk@stoel.com;rene.alvin@stoel.com;kc.harding@stoel.com  
Oren Buchanan Haker on behalf of Creditor Evergreen Aviation & Space Museum oren.haker@stoel.com, kevin.mckenzie@stoel.com;daniel.kubitz@stoel.com;docketclerk@stoel.com;rene.alvin@stoel.com;kc.harding@stoel.com  
Peter J. Kuhn tr on behalf of U.S. Trustee United States Trustee Peter.J.Kuhn@usdoj.gov, James.Gee@usdoj.gov;Lindsey.Huston@usdoj.gov;Suzanne.Verhaal@usdoj.gov  
Ralph R. Mabey on behalf of Creditor iBorrow, L.P. rmabey@kmclaw.com  
Richard C. Terry on behalf of Creditor RLS Capital, Inc. richard@tjblawyers.com, cbcecf@yahoo.com  
Ryan C. Cadwallader on behalf of Creditor iBorrow, L.P. rcadwallader@kmclaw.com, tsanders@kmclaw.com  
Steven M. Rogers on behalf of Creditor American Savings Life Insurance Co. srogers@roruss.com, nrussell@roruss.com;rorusslaw@gmail.com;paralegal@roruss.com  
Thomas E. Goodwin on behalf of Creditor Laura Ann Lange tgoodwin@parrbrown.com, nmckean@parrbrown.com  
United States Trustee USTPRegion19.SK.ECF@usdoj.gov

TOTAL: 42