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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 at McMinnville LLC, Debtor.	Case No. 18-25492 Chapter 11 Honorable Chief Judge R. Kimball Mosier
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**NOTICE OF MOTION TO DISMISS
AND NOTICE OF HEARING**

PLEASE TAKE NOTICE that The Evergreen Aviation and Space Museum and the Captain Michael King Smith Educational Institute (the “**Museum**”) in the United States Bankruptcy Court for the District of Utah a Motion to Dismiss.

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 to Dismiss requests that the Court dismiss the Debtor’s case and find that The Falls at McMinnville LLC’s bankruptcy petition was not properly authorized.

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

1. On or before **November 12, 2018**, you or your lawyer must file with the

Bankruptcy Court a written objection explaining your position at:

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 Unrepresented Debtor at the address listed at the top of this form; AND

2. Attend a hearing on the matter which is set for the 20 day of November, 2018 at 11:00am 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 undersigned Unrepresented Debtor may and will ask the Court to enter an order approving the relief without a hearing.

DATED: October 24, 2018

STOEL RIVES LLP

/s/ Mark E. Hindley

Oren Haker (admitted pro hac vice)

Mark E. Hindley

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of October, 2018 I filed a true and correct copy of the foregoing **NOTICE OF MOTION TO DISMISS 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.

- Michael R. Johnson mjohanson@rqn.com, docket@rqn.com;dburton@rqn.com
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- Laurie A. Cayton trlaurie.cayton@usdoj.gov, James.Gee@usdoj.gov;

I further certify that the Notice was mailed by certified United States mail to the Debtors Mailing Matrix in this Bankruptcy case as of this date.

/s/ Robin Noss

Label Matrix for local noticing
1088-2
Case 18-25492
District of Utah
Salt Lake City
Wed Oct 24 10:01:49 MDT 2018

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West Jordan, UT 84088-5582

The Falls at McMinnville, LLC
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West Jordan, UT 84088-5582

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Lane Scholes
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McMinnville, OR 97128-4532

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Evergreen Aviation & Space Museum

(du)Evergreen Aviation & Space Museum

(u)Gregory Steven Moss

(u)RLS Capital, Inc.

End of Label Matrix	
Mailable recipients	29
Bypassed recipients	4
Total	33