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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
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**NOTICE OF MOTION FOR AUTHORITY TO ENTER INTO INSURANCE
PREMIUM FINANCE AGREEMENTS AND NOTICE OF HEARING**

Objection Deadline: February 15, 2019
Hearing Date: February 19, 2019 at 11:00 a.m. (Mountain)

PLEASE TAKE NOTICE that Michael F. Thomson, the duly appointed Chapter 11 Trustee (the “Trustee”) for the bankruptcy estate of The Falls Event Center LLC (the “Debtor”), has filed with the United States Bankruptcy Court for the District of Utah the *Motion for Authority to Enter Into Insurance Premium Finance Agreements* (the “Motion”).

A copy of the Motion has been 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.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Motion, the Trustee requests that this Court enter an Order authorizing him to enter into the Commercial Premium Finance Agreements with FIRST Insurance Funding, a Division of Lake Forest Bank & Trust Company, N.A. ("FIRST") on behalf of the Debtor, and the Trustee, the Debtor, and FIRST be authorized to take all actions necessary or appropriate to affect said agreements.

PLEASE TAKE FURTHER NOTICE that 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 **February 15, 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 **February 15, 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 hearing on **February 19, 2019 at 11:00 a.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 February 2019

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

CERTIFICATE OF SERVICE – BY NOTICE OF ELECTRONIC FILING (CM/ECF)

I hereby certify that on the 7th day of February 2019, I electronically filed the foregoing **NOTICE OF MOTION FOR AUTHORITY TO ENTER INTO INSURANCE PREMIUM FINANCE AGREEMENTS 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 and will be served through the CM/ECF system.

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- United States Trustee USTPRegion19.SK.ECF@usdoj.gov
- Brent D. Wride bwride@rqn.com, docket@rqn.com; pbrown@rqn.com

CERTIFICATE OF SERVICE – MAIL, OTHER

I hereby certify that on this 7th day of February 2019, I caused to be served a true and correct copy of the **NOTICE OF MOTION FOR AUTHORITY TO ENTER INTO INSURANCE PREMIUM FINANCE AGREEMENTS AND NOTICE OF HEARING** as follows:

Mail Service – By regular first class United States Mail, postage fully pre-paid, addressed to:

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/s/ Erin Johnson