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**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 AN ORDER (I) ESTABLISHING PROCEDURES FOR
INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR
RETAINED PROFESSIONALS, AND (II) GRANTING RELATED RELIEF AND
NOTICE OF HEARING**

Objection Deadline: February 25, 2019, at 4:00 pm (Mountain Time)

Hearing Date: March 5, 2019, at 3:00 pm (Mountain Time)

PLEASE TAKE NOTICE that Michael F. Thomson, duly appointed Chapter 11 Trustee (“Trustee”) in the bankruptcy case of The Falls Event Center LLC (“Debtor”), on February 8, 2019, filed a *Motion for an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals, and (II) Granting Related Relief* (the “Motion”).¹ If you have not received a copy of this Motion and you would like one, please

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

contact Michelle Montoya at: montoya.michelle@dorsey.com, or you can obtain one through the Court's PACER service.

PLEASE TAKE FURTHER NOTICE THAT YOUR RIGHTS MAY BE AFFECTED. You should read this Notice, as well as the Motion, and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.

PLEASE TAKE FURTHER NOTICE that the Motion seeks approval of proposed "Compensation Procedures" for professionals retained in the above-captioned bankruptcy case, as described more fully in the Motion.² Pursuant to the Compensation Procedures, on or before the 15th day of each month following the month for which compensation is sought, each Retained Professional will file a Monthly Fee Statement with the Court. Parties will have 10 days to object to any such Monthly Fee Statement. After the expiration of the Objection Deadline, the Trustee may pay (i) 80% of the undisputed fees and (ii) 100% of the undisputed expenses identified in each Monthly Fee Statement to which no objection has been served. All unresolved objections to a Monthly Fee Statement will be presented to the Court at the next interim or final fee application hearing. No later than 15 days after the close of each calendar quarter, each of the Retained Professionals shall serve and file with the Court an application for interim or final Court approval and allowance, pursuant to Sections 330 and 331 of the Bankruptcy Code (as the case may be), of the compensation and reimbursement of expenses requested.

PLEASE TAKE FURTHER NOTICE that objections to the Motion must be in writing, conform to the Bankruptcy Rules and the Local Rules of the Bankruptcy Court, and be filed with the Bankruptcy Court and served upon the Notice Parties so as to be received by each of the Notice Parties not later than **4:00 p.m. Mountain Time on February 25, 2019.**

PLEASE TAKE FURTHER NOTICE that objections to the Motion must be in writing, conform to the Bankruptcy Rules and the Local Rules of the Bankruptcy Court, and be filed with the Bankruptcy Court and served upon the "Notice Parties": (i) the Trustee, Dorsey & Whitney LLP, 111 South Main Street, 21st Floor, Salt Lake City, UT 84111-2176, Attn: Michael F. Thomson, Chapter 11 Trustee, email: thomson.michael@dorsey.com; (ii) Trustee's Counsel, Dorsey & Whitney LLP, 111 South Main Street, 21st Floor, Salt Lake City, UT 84111-2176, Attn: Peggy Hunt, email: hunt.peggy@dorsey.com; (iii) the Office of the United States Trustee for the District of Utah Office, 405 South Main Street, Suite 300, Salt Lake City, Utah 84111, Attn: John T. Morgan, email: john.t.morgan@usdoj.gov; and (iv) the Committee's Counsel, Holland & Hart, LLP, 222 South Main Street, Ste. 2200, Salt Lake City, UT 84105, Attn: Ellen E Ostrow, email: eostrow@hollandhart.com.

² The following description of the Compensation Procedures is qualified in its entirety by the description in the Motion. In the event of any inconsistency the description in the Motion shall control.

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief requested in the Motion, or if you want the Court to consider your views on the Motion, then you or your attorney must do each of the following:

(1) On or before **4:00 pm Mountain Time on February 25, 2019** (the “Objection Deadline”), file a written objection explaining your objection at. Your written objection must be filed electronically, by mail, or by hand-delivery 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 Court for filing, you must mail it early enough so that the Court will receive it on or before the Objection Deadline specified above. You must also serve a copy on the Notice Parties at the addresses specified above.

(2) Attend the hearing on the Motion at **3:00 pm Mountain Time on March 5, 2019**, before the Honorable R. Kimball Mosier, in his courtroom, Room 369, of the Frank E. Moss United States Courthouse, 350 South Main Street, Salt Lake City, Utah 84101. Failure to attend the hearings will be deemed a waiver of your objection.

If you or your attorney do not take these two 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 may and will ask the Court to strike the hearing and enter an order approving the Motion without hearing.

DATED this 7th day of February, 2019.

DORSEY & WHITNEY LLP

/s/ Michael F. Thomson

Michael F. Thomson
Peggy Hunt
John J. Wiest
*Attorneys for Michael F. Thomson, Chapter
11 Trustee*