

Mona L. Burton, #5399
Doyle S. Byers, #11440
Ellen E. Ostrow, #14743
HOLLAND & HART LLP
222 S. Main Street, Suite 2200
Salt Lake City, UT 84101
Telephone: (801) 799-5800
Fax: (801) 799-5700
mburton@hollandhart.com
dsbyers@hollandhart.com
eeostrow@hollandhart.com
*Counsel for Official Committee of Unsecured Creditors
of The Falls Event Center, LLC*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In re:

THE FALLS AT GILBERT, LLC,

Debtor.

Bankruptcy No. 18-25419

Chapter 11

Honorable R. Kimball Mosier

**JOINDER AND OBJECTION OF OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF THE FALLS EVENT CENTER LLC TO RLS CAPITAL, INC.'S
MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

The Official Committee of Unsecured Creditors appointed in the case of The Falls Event Center LLC (the “**Committee**”), by and through its counsel, pursuant to § 1109(b), joins in The Falls at Gilbert, LLC’s *Opposition to Creditor RLS Capital, Inc.’s Motion for Relief from the Automatic Stay* (the “**Objection**”) [Docket No. 18]. For the reasons set forth in the Objection, the Committee respectfully objects to the relief requested in RLS Capital, Inc.’s *Motion for Relief from the Automatic Stay or in the Alternative to Prohibit Use of Cash Collateral* [Docket No.

14].¹

DATED: October 22, 2018

HOLLAND & HART LLP

/s/ Ellen E. Ostrow

Mona L. Burton

Doyle S. Byers

Ellen E. Ostrow

*Attorneys for Official Committee of Unsecured
Creditors, The Falls Event Center LLC*

¹ Nothing contained herein is a waiver of any objection the Committee may have to The Falls Event Center LLC moving to substantively consolidate its Chapter 11 case with that of The Falls at Gilbert, LLC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 22nd day of October, 2018 a copy of the foregoing was served as follows:

By Electronic Service: I certify that the parties of record in this case as identified below, are registered CM/ECF users:

- Laurie A. Cayton tr laurie.cayton@usdoj.gov, James.Gee@usdoj.gov; Lindsey.Huston@usdoj.gov; Suzanne.Verhaal@usdoj.gov
- Michael R. Johnson mjohnson@rqn.com, docket@rqn.com; dburton@rqn.com
- Elaine A. Monson emonson@rqn.com, docket@rqn.com; pbrown@rqn.com
- Richard C. Terry richard@tjblawyers.com, cbcecf@yahoo.com
- United States Trustee USTPRegion19.SK.ECF@usdoj.gov
- Brent D. Wride bwride@rqn.com, docket@rqn.com; pbrown@rqn.com

/s/ Ellen E. Ostrow _____

11563055_1