

Oren B. Haker (OSB #130162) (*admitted pro hac vice*)

*oren.haker@stoel.com*

Mark E. Hindley (UTB #7222)

*mark.hindley@stoel.com*

STOEL RIVES LLP

Suite 1100, One Utah Center

201 South Main Street

Salt Lake City, Utah 84111

Telephone: (801) 328-3131

Facsimile: (801) 578-6999

*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 Event Center LLC,

Debtor.

Bankr. No. 18-25116

Chapter 11

Honorable Chief Judge R. Kimball Mosier

**STIPULATED MOTION FOR CONTINUANCE OF MAY 6, 2019 HEARING  
UNTIL JUNE 27, 2019 AT 10:00 A.M.**

Pursuant to Local Rule 9071-1, the Evergreen Aviation and Space Museum and The Captain Michael King Smith Educational Institute (the “*Museum*”) and Michael F. Thomson. Chapter 11 Trustee of The Falls Event Center (the “*Trustee*”) (collectively, the “*Parties*”) request leave to continue the May 6, 2019, hearing to facilitate ongoing claims investigation and settlement discussions until June 27, 2019 at 10:00 a.m. The Parties expect that by the date of the continued hearing, they will either have settled the issues set for hearing: the Museum’s *Motion for Stay Relief* (Docket #267), and the Trustee’s *Motion to Consolidate* The Falls Event Center (Docket #327), or the Parties will be prepared to

pursue the issues before the Court. Accordingly, the Parties agree that a brief continuance is in the best interest of all parties and the Court.

DATED: May 2, 2019

**STOEL RIVES LLP**

*/s/ Oren B. Haker*

\_\_\_\_\_  
Oren B. Haker (OSB #130162)  
(admitted pro hac vice)  
Mark E. Hindley (UTB #7222)

STOEL RIVES LLP  
Suite 1100, One Utah Center  
201 South Main Street  
Salt Lake City, Utah 84111  
Telephone: (801) 328-3131  
Facsimile: (801) 578-6999

*Attorneys for Evergreen Aviation and Space  
Museum and The Captain Michael King Smith  
Educational Institute*

**DORSEY & WHITNEY LLP**

*/s/ Peggy Hunt*

\_\_\_\_\_  
Peggy Hunt  
Jessica McKinlay

*Attorneys for Michael F. Thomson, Chapter 11  
Trustee of The Falls Event Center*

### CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of May, 2019 I filed a true and correct copy of the foregoing STIPULATED MOTION FOR CONTINUANCE OF MAY 6, 2019 HEARING UNTIL JUNE 27, 2019 AT 10:00 A.M. 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.

#### By Electronic Service:

- James W. Anderson jwa@clydesnow.com, mmann@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 readwallader@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@ecfcbis.com; montoya.michelle@dorsey.com
- United States Trustee USTPRegion19.SK.ECF@usdoj.gov
- John J. Wiest wiest.john@dorsey.com

**By U.S. First-Class Mail:**

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

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

Albert B Clark  
696 East 1220 North  
Orem, UT 84097

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

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

Brent Davies Pulley  
2148 East Caroline Ln  
Tempe, AZ 85284

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

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

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

DATED: May 2, 2019

---



Kevin P. McKenzie  
Legal Secretary

*Prepared and Submitted By:*

Oren B. Haker (OSB #130162) (*admitted pro hac vice*)

*oren.haker@stoel.com*

Mark E. Hindley (UTB #7222)

*mark.hindley@stoel.com*

STOEL RIVES LLP

Suite 1100, One Utah Center

201 South Main Street

Salt Lake City, Utah 84111

Telephone: (801) 328-3131

Facsimile: (801) 578-6999

*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 Event Center LLC,

Debtor.

Bankr. No. 18-25116

Chapter 11

Honorable Chief Judge R. Kimball Mosier

**STIPULATED ORDER FOR CONTINUANCE OF MAY 6, 2019 HEARING  
UNTIL JUNE 27, 2019 AT 10:00 A.M.**

This matter came before the Court on the *Stipulated Motion for Continuance* filed by the Evergreen Aviation and Space Museum and The Captain Michael King Smith Educational Institute (the “*Museum*”) and Michael F. Thomson, Chapter 11 Trustee of The Falls Event Center (the “*Trustee*”) relating to the hearing currently scheduled for May 6, 2019.

The Court, after reviewing the Motion, and such other relevant documents as the Court deemed appropriate, has determined that good cause exists to continue the May 6, 2019 hearing until June 27, 2019 at 10:00 a.m.

**IT IS HEREBY ORDERED** that the Stipulated Motion for Continuance is **GRANTED**. The hearing on the Museum's the Museum's *Motion for Stay Relief* (Docket #267), and the Trustee's *Motion to Consolidate* The Falls Event Center (Docket #327) is continued until June 27, 2019 at 10:00 a.m.

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

*Agreed as to Form and Content:*

**STOEL RIVES LLP**

/s/ Oren Haker  
Oren Haker (admitted pro hac vice)  
Mark Hindley

*Attorneys for Evergreen Aviation and Space Museum  
and The Captain Michael King Smith Educational  
Institute*

**DORSEY & WHITNEY LLP**

/s/ Peggy Hunt  
Peggy Hunt  
Jessica McKinlay

*Attorneys for Michael F. Thomson. Chapter 11  
Trustee of The Falls Event Center*