

Michael F. Thomson (#9707)
Peggy Hunt (#6060)
Jessica G. McKinlay (#11210)
DORSEY & WHITNEY LLP
111 South Main Street, 21st Floor
Salt Lake City, UT 84111-2176
Telephone: (801) 933-7360
Facsimile: (801) 933-7373
Email: thomson.michael@dorsey.com
hunt.peggy@dorsey.com
mckinlay.jessica@dorsey.com

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

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

In re:

THE FALLS EVENT CENTER LLC; THE FALLS AT CLOVIS, LLC; THE FALLS AT FRESNO, LLC; THE FALLS AT GILBERT, LLC; THE FALLS AT MCMINNVILLE, LLC; THE FALLS AT ST. GEORGE, LLC; *and* THE FALLS OF LITTLETON, LLC,

Debtors.

Bankr. Case No. 18-25116
Bankr. Case No. 18-28140
Bankr. Case No. 18-27713
Bankr. Case No. 18-25419
Bankr. Case No. 18-25492
Bankr. Case No. 18-26653
Bankr. Case No. 18-27111

Chapter 11

The Honorable R. Kimball Mosier

CHAPTER 11 TRUSTEE’S MOTION TO SUBSTANTIVELY CONSOLIDATE THE FALLS EVENT CENTER LLC WITH DEBTORS THE FALLS AT CLOVIS, LLC, THE FALLS AT FRESNO, LLC, THE FALLS AT GILBERT, LLC, THE FALLS AT MCMINNVILLE, LLC, THE FALLS AT ST. GEORGE, LLC, AND THE FALLS OF LITTLETON, LLC; *and* NON-DEBTORS THE FALLS AT AUSTIN BLUFFS, LLC, THE FALLS AT CUTTEN ROAD, LLC, THE FALLS AT STONE OAK PARKWAY, LLC, THE FALLS AT BEAVERTON, LLC, AND THE FALLS AT ROSEVILLE, LLC

Pursuant to 11 U.S.C. § 105(a), Michael F. Thomson, the duly appointed Chapter 11 Trustee (the “Trustee”) for The Falls Event Center LLC (“TFEC”), hereby requests that the

Court enter an *Order* substantively consolidating TFEC with debtors The Falls at Clovis, LLC, The Falls at Fresno, LLC, The Falls at Gilbert, LLC, The Falls at McMinnville, LLC, The Falls at St. George, LLC, and The Falls of Littleton, LLC; *and* non-debtors The Falls at Austin Bluffs, LLC; The Falls at Cutten Road, LLC; The Falls at Stone Oak Parkway, LLC; The Falls at Beaverton, LLC, and The Falls at Roseville, LLC as of July 11, 2018, the date that TFEC filed its Chapter 11 case. This Motion is supported by a *Memorandum of Law*, the *Declaration of Michael F. Thomson*, as Trustee for TFEC, and the *Declaration of Gil A. Miller*, all of which are filed concurrently herewith.

WHEREFORE, for the reasons set forth in the Memorandum of Law, the Trustee respectfully requests that the Court enter an Order as requested herein. Notice of the Motion will be served on all creditors and parties in interest of TFEC as well as all of its affiliated companies.

DATED: February 15, 2019

DORSEY & WHITNEY LLP

/s/ Peggy Hunt
Peggy Hunt
Jessica McKinlay
*Attorneys for Michael F. Thomson, Chapter
11 Trustee of The Falls Event Center*