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Counsel for iBorrow, L.P.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

In re:	Bankruptcy No. 18-25116-RKM
The Falls Event Center, LLC,	Chapter 11
Debtor.	Chief Judge R. Kimball Mosier

**NOTICE OF MOTION FOR RELIEF FROM STAY
AND MEMORANDUM IN SUPPORT
AND NOTICE OF HEARING**

Hearing Date and Time: August 28, 2018, at 11:00 a.m. MT
Objection Deadline: August 20, 2018

PLEASE TAKE NOTICE THAT iBorrow, L.P., a secured creditor (“iBorrow”) has filed a “Motion for Relief from Stay and Memorandum in Support” (the “Motion”), seeking entry of an order pursuant to Section 362 of the Bankruptcy Code and Rules 4001 and 9014 of the Federal Rules of Bankruptcy Procedure, granting iBorrow relief from the automatic stay to resume and proceed with recovery and foreclosure of the Property (located at 8280 / 8290 Elk

Grove Blvd., Elk Grove, CA 95828) and to exercise rights and remedies under the loan documents and applicable state law, finding that cause exists for relief from the automatic stay or, alternatively, finding that Debtor and the Debtor's estate lack equity in the Property and that the Property is not necessary to an effective reorganization, and for waiver of the 14-day stay period under Rule 4001(a)(3) of the Federal Rules of Bankruptcy Procedure, all as more particularly described in the Motion.

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT WITH ONE.

A copy of the Motion, if not served herewith, may be obtained upon written request to the undersigned counsel or through the Utah Bankruptcy Court CM/ECF system accessible at <https://ecf.utb.uscourts.gov/>.

If you do not want the Court to grant the relief requested in the Motion, then you or your attorney must:

(1) On or before **August 20, 2018**, file with the Court a written response to the Motion explaining your position at:

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 **August 20, 2018**. You must also mail a copy to the undersigned counsel at:

Ralph R. Mabey
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Telephone: 801-328-3600

(2) A hearing to consider the Motion has been set for **August 28, 2018, at 11:00 a.m. prevailing Mountain Time,** Courtroom 369, United States Bankruptcy Court, 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 position.

PLEASE TAKE FURTHER NOTICE THAT if you or your attorney do not take these steps, the 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 strike the hearing and enter an order approving the Motion without a hearing.

DATED this 2nd day of August, 2018.

/s/ Adelaide Maudsley
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on this 2nd day of August, 2018, (i) by first class US Mail, postage prepaid, to each party listed on the attached mailing matrix, and (ii) by CM/ECF noticing to each of the following:

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/s/ Torri Slaughter, Legal Assistant

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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Golf 6061, LLC

End of Label Matrix	
Mailable recipients	339
Bypassed recipients	1
Total	340