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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. 18-25208-RKM
The Falls at Elk Grove, LLC,	Chapter 11
Debtor.	Chief Judge R. Kimball Mosier

**NOTICE OF MOTION FOR RELIEF FROM STAY WITH IMPOSITION OF BAR ON
REFILING OR, IN THE ALTERNATIVE, MOTION TO DISMISS
CHAPTER 11 CASE WITH PREJUDICE, 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 with Imposition of Bar on Refiling or, in the alternative, Motion to Dismiss Chapter 11 Case, and Memorandum in Support” (the “Motion”), seeking entry of an order (i) 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 the recovery and foreclosure of real property located at 8280 / 8290 Elk Grove Blvd., Elk Grove, CA 95828 (the “Property”), to exercise rights and remedies under loan documents and applicable state law, based upon findings that Debtor and the estate lack equity in the Property and that the Property is not necessary to an effective reorganization or, alternatively, that cause exists for relief from the automatic stay, and for imposition of a bar on re-filing and for waiver of the 14-day stay period under Rule 4001(a)(3) of the Federal Rules of Bankruptcy Procedure, or, in the alternative, (ii) dismissing the Debtor’s chapter 11 case with prejudice, 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
Adelaide Maudsley
Kirton McConkie
50 E. South Temple, #400
Salt Lake City, UT 84111
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
Ralph R. Mabey (Utah Bar No. 2036)
Adelaide Maudsley (Utah Bar No. 8791)
KIRTON McCONKIE P.C.
50 East South Temple #400
Salt Lake City, UT 84111
Telephone: 801.328.3600
Email: amaudsley@kmclaw.com

Counsel for iBorrow, L.P.

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:

- Laurie A. Cayton tr laurie.cayton@usdoj.gov,
James.Gee@usdoj.gov;Lindsey.Huston@usdoj.gov;Suzanne.Verhaal@usdoj.gov
- Elaine A. Monson emonson@rqn.com, docket@rqn.com;pbrown@rqn.com
- United States Trustee USTPRegion19.SK.ECF@usdoj.gov

/s/ Torri Slaughter, Legal Assistant

MAILING MATRIX dated July 30, 2018

Label Matrix for local noticing
1088-2
Case 18-25208
District of Utah
Salt Lake City
Mon Jul 30 11:22:54 MDT 2018

Brian Good
iBorrow
12100 Wilshire Blvd., Suite 520
Los Angeles, CA 90025-7129

California Dept. of Tax & Fee Admin
Account Information Group, MIC: 29
P.O. Box 942879
Sacramento, CA 94279-0029

Laurie A. Cayton tr
US Trustees Office
Washington Federal Bank Building
405 South Main Street
Suite 300
Salt Lake City, UT 84111-3402

Eagle Group Finance, L.P.
12100 Wilshire Blvd., Suite 520
Los Angeles, CA 90025-7129

Fidelity National Title Company
1101 Investment Blvd., Suite 170
El Dorado Hills, CA 95762-5746

Franchise Tax Board
Bankruptcy Sectoin, MS: A-340
P.O. Box 2952
Sacramento, CA 95812-2952

Glenn D. Taxman
Much Shelist
2 Park Plaza, Suite 1075
Irvine, CA 92614-8587

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Elaine A. Monson
Ray Quinney & Nebeker
36 South State Street
14th Floor
P.O. Box 45385
Salt Lake City, UT 84145-0385

Sacramento County Tax Collector
P.O. Box 508
Sacramento, CA 95812-0508

The Falls Event Center LLC
9067 South 1300 West, Suite 301
West Jordan, UT 84088-5582

The Falls at Elk Grove, LLC
9067 South 1300 West
Suite 301
West Jordan, UT 84088-5582

The Falls at St. George, LLC
9067 South 1300 West, Suite 301
West Jordan, UT 84088-5582

United States Trustee
Washington Federal Bank Bldg.
405 South Main Street
Suite 300
Salt Lake City, UT 84111-3402

eFalls Properties Fresno CA, LLC
9067 South 1300 West, Suite 301
West Jordan, UT 84088-5582

End of Label Matrix
Mailable recipients 15
Bypassed recipients 0
Total 15