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

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

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In re:  THE FALLS AT FRESNO, LLC,  Debtor.	Bankr. Case No. 18-27713  Chapter 11  The Honorable R. Kimball Mosier
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**OBJECTION TO UNITED STATES TRUSTEE'S  
RECOMMENDATION FOR DISMISSAL**

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Michael F. Thomson, Chapter 11 trustee of the bankruptcy estate of The Falls Event Center LLC (the "TFEC Trustee"), by and through counsel, hereby objects to the United States Trustee's Recommendation for Dismissal [Docket No. 17] (the "Recommendation"), based upon the following:

1. The Recommendation requests that the case be dismissed on the grounds that "The Debtor failed file a Statement of Financial Affairs and Schedules A through J within the time provide by Fed. R. Bankr. P. 1007 or within any extension granted under 11 U.S.C. § 1116(3)."

2. The Debtor has now filed its Statement of Financial Affairs and Schedules A through J.

3. In addition, the TFEC Trustee will be filing a motion seeking substantive consolidation of this case with the Chapter 11 Case of The Falls Event Center LLC, Chapter 11 case number 18-25116.

WHEREFORE, the TFEC Trustee objects to the Recommendation and requests that the Court enter an order denying same.

DATED this 22nd day of January 2019

/s/ Jessica McKinlay

Michael F. Thomson

Peggy Hunt

Jessica McKinlay

DORSEY & WHITNEY LLP

Attorneys for Chapter 11 Trustee

**CERTIFICATE OF SERVICE – BY NOTICE OF ELECTRONIC FILING (CM/ECF)**

I hereby certify that on the 22nd day of January 2019, I electronically filed the foregoing **OBJECTION TO UNITED STATES TRUSTEE’S RECOMMENDATION FOR DISMISSAL** 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 and will be served through the CM/ECF system.

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