

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
for The Falls Event Center, LLC*

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

In re: THE FALLS AT MCMINNVILLE LLC, Debtor.	Bankr. Case No. 18-25492 Chapter 11 The Honorable R. Kimball Mosier
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**NOTICE OF APPLICATION OF MICHAEL F. THOMSON, CHAPTER 11 TRUSTEE,
FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT OF JONES
LANG LASALLE AMERICAS, INC., AND JONES LANG LASALLE BROKERAGE,
INC., AS REAL ESTATE BROKER FOR THE TRUSTEE FOR THE FALLS AT
MCMINNVILLE LLC AND NOTICE OF HEARING**

**Objection Deadline: April 19, 2019
Hearing Date: April 30, 2019 at 3:00 p.m. (Mountain)**

PLEASE TAKE NOTICE that Michael F. Thomson, the duly appointed Chapter 11 Trustee (the “Trustee”) for the bankruptcy estate of The Falls Event Center LLC (the “Debtor”), has filed with the United States Bankruptcy Court for the District of Utah the *Application of Michael F. Thomson, Chapter 11 Trustee, for Entry of an Order Authorizing the Employment of*

Jones Lang LaSalle Americas, Inc., and Jones Lang LaSalle Brokerage, Inc., as Real Estate Broker for the Trustee for The Falls at McMinnville LLC (the “Application”). The Application is supported by the Amended Declaration of Brian Anderson in Support of Application of Michael F. Thomson, Chapter 11 Trustee, for Entry of an Order Authorizing the Employment of Jones Lang LaSalle Americas, Inc., and Jones Lang LaSalle Brokerage, Inc., as Real Estate Broker for the Trustee (the “Declaration”).

Copies of the Application and the Declaration have been served electronically via the Court’s CM/ECF system or via First Class U.S. Mail on the Office of the United States Trustee and on parties who have entered an appearance in the above-captioned bankruptcy case. If you have not received a copy of the Application or Declaration referenced above and you would like one, you may obtain a copy by requesting one from the undersigned counsel.

YOUR RIGHTS MAY BE AFFECTED. You should read the Application carefully and discuss it with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

PLEASE TAKE FURTHER NOTICE that pursuant to 11 U.S.C. § 327 and Federal Rule of Bankruptcy Procedure 2014, the Trustee seeks the entry of an order authorizing the Trustee to employ and retain Jones Lang LaSalle Americas, Inc. and Jones Lang LaSalle Brokerage, Inc. as real estate broker for The Falls at McMinnville LLC.

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief requested in the Application, then you or your attorney must do the following:

- (1) On or before **April 19, 2019**, file with the Bankruptcy Court a written Objection explaining your position, at:

Clerk of the Court
United States Bankruptcy Court
350 South Main Street, Room 301
Salt Lake City, UT 84101

(2) If you mail your objection to the Bankruptcy Court for filing, you must mail it early enough so that the Court will **receive** it on or before **April 19, 2019**. You must also mail a copy to the undersigned counsel at 111 South Main Street, Suite 2100, Salt Lake City, Utah 84111.

(3) You must also attend the hearing on **April 30, 2019 at 3:00 p.m. Mountain Time** before the Honorable R. Kimball Mosier, Chief United States Bankruptcy Judge, in his courtroom, Room 369 of the Frank E. Moss United States Courthouse, 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 objection.**

If you or your attorney do not take these steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Application 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 enter an order approving the Application without hearing.

DATED this 2nd day of April 2019.

/s/ Jessica G. McKinlay
Michael F. Thomson
Peggy Hunt
Jessica G. McKinlay
DORSEY & WHITNEY LLP
Attorneys for Chapter 11 Trustee

CERTIFICATE OF SERVICE, BY NOTICE OF ELECTRONIC FILING

I hereby certify that on the 2nd day of April 2019, I electronically filed the foregoing **NOTICE OF APPLICATION OF MICHAEL F. THOMSON, CHAPTER 11 TRUSTEE, FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT OF JONES LANG LASALLE AMERICAS, INC., AND JONES LANG LASALLE BROKERAGE, INC., AS REAL ESTATE BROKER FOR THE TRUSTEE FOR THE FALLS AT MCMINVILLE LLC AND NOTICE OF HEARING** 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.

- Megan K Baker baker.megan@dorsey.com, long.candy@dorsey.com
- Marlon L. Bates marlon@scalleyreading.net, jackie@scalleyreading.net
- Darwin H. Bingham dbingham@scalleyreading.net, cat@scalleyreading.net
- Laurie A. Cayton tr laurie.cayton@usdoj.gov, James.Gee@usdoj.gov;Lindsey.Huston@usdoj.gov;Suzanne.Verhaal@usdoj.gov
- 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
- Mary Margaret Hunt hunt.peggy@dorsey.com, long.candy@dorsey.com
- Jessica G. McKinlay mckinlay.jessica@dorsey.com, Segovia.Maria@dorsey.com
- Darren B. Neilson darren@neilsonlaw.co
- Ellen E Ostrow eeostrow@hollandhart.com, intaketeam@hollandhart.com;lahansen@hollandhart.com
- Chad Rasmussen chad@alpinalegal.com, contact@alpinalegal.com
- Jeffrey B. Smith jsmith@cgsattys.com
- 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

CERTIFICATE OF SERVICE – MAIL, OTHER

I hereby certify that on this 2nd day of April 2019 I caused to be served a true and correct copy of the foregoing **NOTICE OF APPLICATION OF MICHAEL F. THOMSON, CHAPTER 11 TRUSTEE, FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT OF JONES LANG LASALLE AMERICAS, INC., AND JONES LANG LASALLE BROKERAGE, INC., AS REAL ESTATE BROKER FOR THE TRUSTEE FOR THE FALLS AT MCMINVILLE LLC AND NOTICE OF HEARING** as follows:

Mail Service – By regular first class United States Mail, postage fully pre-paid, addressed to:

Jones Lang LaSalle Americas, Inc.
c/o Brian Anderson
111 South Main Street, Suite 300
Salt Lake City, Utah 84111

The Falls at McMinnville, LLC
9067 South 1300 West, Suite 301
West Jordan, UT 84088

Jones Lang LaSalle
200 East Randolph Drive
Chicago, IL 60601
Attention: Regional Counsel

/s/ Melissa Boynton