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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH

In re:

CASTLE ARCH REAL ESTATE
INVESTMENT COMPANY, LLC

Debtors.

Bankruptcy Case No. 11-35082

(Chapter 11)

The Honorable Joel T. Marker

MOTION TO REMOVE TRUSTEE OR ALTERNATIVELY TO CONVERT CASE

The Hunt Law Corporation (“Hunt”), a creditor of Castle Arch Real Estate Investment Company, LLC (“CAREIC”) by and through counsel, herein joins the Motion to Remove Trustee or, Alternatively to Convert Case filed by Prince Yeates and Geldzahler (“Prince, Yeates) on or about December 13, 2012 (Docket 522) and independently moves the Court under 11 U.S.C. § 324 for an Order removing D. Ray Strong (“Strong”) as Chapter 11 Trustee and appointing a Trustee for CAREIC’s estate who is and will be independent of the trustee of the estates now being jointly administered by Strong including CAOP Manager LLC, *Bankruptcy Number 11-35237*, (“CAOP Manager”); Castle Arch Opportunity Partners I, LLC, *Bankruptcy Case No. 11-35240*, (“CAOP I”); Castle Arch Opportunity Partners II, LLC, *Bankruptcy Case*

No. 35241 (“CAOP II”); Castle Arch Kingman, LLC, *Bankruptcy Case No., 11-35082* (“CAK”); Castle Arch Secured Development Fund, LLC, *Bankruptcy Case No., 11-35243*, (“SDF”) and Castle Arch Smyrna, LLC. *Bankruptcy Case No. 11-35246* (“CAS”). In the alternative, Hunt moves the Court pursuant to 11 U.S.C. § 1112(b) to convert CAREIC’s case to a case under Chapter 7 of the Bankruptcy Code under the administration of an independent Chapter 7 Trustee.

The instant Motion is based upon the grounds that the intercompany claims and disputes between the estate of CAREIC and the other debtor’s jointly administered by Strong, including CAOP Manager, CAOP I, CAOP II, CAK, SDF and CAS create an actual conflict of interest that prevents Strong from acting as a disinterested Trustee for the benefit of CAREIC’s creditors. In support of the instant Motion, Hunt incorporates the Memorandum in Support of Motion to Remove the Trustee or, Alternatively, Convert Case filed by Prince Yeates on or about November 13, 2012 (Docket 523).

DATED this 3rd day of January, 2013.

COHNE, RAPPAPORT & SEGAL, P.C.

/s/ Julie A. Bryan

Julie A. Bryan

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of January, 2013, the foregoing was filed with the Court and served via the Court's CM/ECF system upon all parties that receive electronic notice in the above-captioned, jointly administered bankruptcy case including but not limited to:

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/s/ Julie A. Bryan
