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*Attorneys for D. Ray Strong, Liquidating Trustee and
Post-Confirmation Representative of the Debtors*

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

In re:

CASTLE ARCH REAL ESTATE
INVESTMENT COMPANY, LLC; CAOP
MANAGERS, LLC; CASTLE ARCH
KINGMAN, LLC; CASTLE ARCH
SECURED DEVELOPMENT FUND, LLC;
CASTLE ARCH SMYRNA, LLC; CASTLE
ARCH STAR VALLEY, LLC; *and*

CASTLE ARCH OPPORTUNITY
PARTNERS I, LLC; CASTLE ARCH
OPPORTUNITY PARTNERS II, LLC,

Debtors.

Case Nos. 11-35082, 11-35237,
11-35243, 11-35242 and 11-35246
(Substantively Consolidated)

Case Nos. 11-35241 and 11-35240
(Jointly Administered)

(Chapter 11)
The Honorable Joel T. Marker

- Affects All Debtors
- Affects the Substantively
Consolidated Debtors
- Affects Castle Arch
Opportunity Partners I, LLC
- Affects only Castle Arch
Opportunity Partners II, LLC

**NOTICE OF TRUSTEE'S MOTION FOR ORDER APPROVING SETTLEMENT
AGREEMENT WITH FORTIUS FINANCIAL ADVISORS, LLC UNDER FEDERAL
RULE OF BANKRUPTCY PROCEDURE 9019 AND
NOTICE OF OPPORTUNITY FOR HEARING**

Objection Deadline: December 1, 2014
Reserved Hearing Date: December 15, 2014 at 2:30 p.m. (Mountain Time)

PLEASE TAKE NOTICE that D. Ray Strong, the post-confirmation estate representative for the above-captioned Debtors and the duly appointed Liquidating Trustee of the Consolidated Legacy Debtors Liquidating Trust and the Castle Arch Opportunity Partners I, LLC Liquidating Trust, will file with the United States Bankruptcy Court for the District of Utah (the “Court”) the *Trustee’s Motion for Order Approving Settlement Agreement with Fortius Financial Advisors, LLC Under Federal Rule of Bankruptcy Procedure 9019* (the “Motion”).

A copy of the Motion will be served electronically via the Court’s CM/ECF system on the Office of the United States Trustee and on all parties who receive electronic service in the above-captioned case. If you do not receive a copy of the Motion and you would like one, you may obtain a copy by requesting it from the undersigned counsel.

YOUR RIGHTS MAY BE AFFECTED. You should carefully read this Notice, as well as the Motion, and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.

PLEASE TAKE FURTHER NOTICE that pursuant to the Motion, the Trustee is seeking an Order from the Court approving the Settlement Agreement, attached as Exhibit A to the Motion (the “Settlement Agreement”), that he entered into with Fortius Financial Advisors, LLC (“Fortius”). Without limiting or altering the terms of the Settlement Agreement, the Trustee provides the following summary of the Agreement:

(a) Fortius will pay the aggregate sum of Fifteen Thousand Dollars (\$15,000.00), for the benefit of the Trusts, as follows:

PAYMENT DATE¹	PAYMENT AMOUNT
On or before January 15, 2015	\$3,000.00
On or before April 15, 2015	\$3,000.00
On or before July 15, 2015	\$3,000.00
On or before October 15, 2015	\$3,000.00
On or before January 15, 2016	\$3,000.00

(b) Within five (5) business days of the Trustee's receipt of the final installment of the settlement payment, the Trustee will file in the Adversary Proceeding that he commenced against Fortius a Stipulated Notice of Dismissal, dismissing Fortius from the Adversary Proceeding with prejudice.

(c) The Trustee and Fortius will provide each other with a mutual release of claims, as set forth in the Settlement Agreement.

NO HEARING WILL BE CONDUCTED ON THE MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE COURT ON OR BEFORE THE OBJECTION DEADLINE.

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

(1) On or before **December 1, 2014**, file with the 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 Court for filing, you must mail it early enough so that the Court will actually receive it on or before December 1, 2014. You must also mail a copy

¹ If any of the below payment dates falls on a Saturday, Sunday or legal holiday, the payment will be due on the following business day.

of your objection to the Trustee's undersigned counsel at 136 South Main Street, Suite 1000, Salt Lake City, Utah 84101.

(3) You must also attend the hearing on the Motion on **December 15, 2014 at 2:30 p.m.** (**Mountain Time**) before the Honorable Joel T. Marker, United States Bankruptcy Judge, in his courtroom, Room 341 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.

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. Additionally, pursuant to the Court's local rules, absent timely filing and service of responses and objections to the Motion, the Trustee may and will ask the Court to enter an Order approving the Motion without a hearing.

DATED this 14th day of November, 2014.

DORSEY & WHITNEY LLP

 /s/ Peggy Hunt
Peggy Hunt
Nathan S. Seim
Attorneys for D. Ray Strong, Trustee