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*Attorneys for D. Ray Strong, Liquidating Trustee  
of the Consolidated Legacy Debtors Liquidating  
Trust*

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

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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

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**NOTICE OF MOTION OF THE LIQUIDATING TRUSTEE FOR ORDER  
APPROVING BIDDING PROCEDURES AND GRANTING BIDDING PROTECTIONS  
AND NOTICE OF HEARING**

**Proposed Objection Deadline for Bidding Procedures Motion: July 14, 2015 at 4:00 p.m.  
(Mountain Time)**

**Proposed Hearing Date for Bidding Procedures Motion: July 15, 2015 at 11:00 a.m.  
(Mountain Time)**

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**PLEASE TAKE NOTICE** that D. Ray Strong, as the post-confirmation estate representative of the above-captioned Debtors and the Liquidating Trustee of the Consolidated Legacy Debtors Liquidating Trust (the “Trust”), by and through his counsel, has filed with the United States Bankruptcy Court for the District of Utah (the “Court”) the *Motion of the Liquidating Trustee for Order Approving Bidding Procedures and Granting Bidding Protections* (the “Motion”).

A copy of the Motion has been 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. It has also been served on all parties who have expressed interest in purchasing the property at issue in the Motion and who have submitted prior offers to purchase such property. If you have not received 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 “Bidding Procedures” and “Bidding Protections” (as these terms are defined in the Motion) related to the sale of real property located in Rutherford County, Tennessee.

**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 **July 14, 2015 at 4:00 p.m. (Mountain Time)**, 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 the Court will actually receive it on or before July 14, 2015 at 4:00 p.m. (Mountain Time). You must also mail a copy of your objection to the Trustee's undersigned counsel for the Trust at:

Dorsey & Whitney LLP  
c/o Peggy Hunt  
136 South Main Street, Suite 1000  
Salt Lake City, Utah 84101  
[hunt.peggy@dorsey.com](mailto:hunt.peggy@dorsey.com)

(3) You must also attend the hearing on the Motion on **July 15, 2015, at 11:00 a.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 2nd day of July, 2015.

**DORSEY & WHITNEY LLP**

    /s/ Peggy Hunt      
Peggy Hunt  
Milo Steven Marsden  
Sarah Goldberg  
*Attorneys for Consolidated Legacy  
Debtors Liquidating Trust*

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

I hereby certify that on July 2, 2015, I electronically filed the foregoing **NOTICE OF MOTION OF THE LIQUIDATING TRUSTEE FOR ORDER APPROVING BIDDING PROCEDURES AND GRANTING BIDDING PROTECTIONS AND NOTICE OF HEARING** (the “Notice”) 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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- Kim R. Wilson bankruptcy\_krw@scmlaw.com
- Brock N. Worthen bworthen@swlaw.com
- Richard L. Wynne rlwynne@jonesday.com

/s/ Peggy Hunt

**CERTIFICATE OF SERVICE – BY EMAIL**

I further certify that on July 2, 2015, the Notice was sent via email to the following parties, who have expressed an interest in purchasing or have made an offer to purchase the property at issue in the Notice:

DTB Investments, L.P.  
c/o Harold duPerier III (registered agent)  
28615 Interstate 10 W  
Boerne, TX 78006  
[Trip@TexasLandMan.net](mailto:Trip@TexasLandMan.net)

DSSIII Holding, LLC  
c/o Drapac Group USA  
6161 Santa Monica Blvd., Suite 102  
Los Angeles, CA 90038  
Attn: Tyson J. Reilly  
[Tyson@drapacusa.com](mailto:Tyson@drapacusa.com)

Tew & Associates  
c/o Joel Tew  
2999 Palm Harbor Blvd., Suite A  
Palm Harbor, FL 34655  
[JTew@tewlaw.us](mailto:JTew@tewlaw.us)

Walton Tennessee, LLC  
c/o Walton International Group (USA), Inc.  
Attn: Wayne Souza, Esq.  
4800 North Scottsdale Road, Suite 4000  
Scottsdale, AZ 85251  
[wsouza@walton.com](mailto:wsouza@walton.com)

John Morgan  
U.S. Trustee  
450 South Main Street, Suite 300  
Salt Lake City, Utah 84111  
[john.t.morgan@usdoj.gov](mailto:john.t.morgan@usdoj.gov)

/s/ Peggy Hunt