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7
8 **SUPERIOR COURT OF ARIZONA**
9 **MARICOPA COUNTY**

10 **ARIZONA CORPORATION**
11 **COMMISSION**

12 Plaintiff,

13 v.

14 **MATHON MANAGEMENT COMPANY,**
15 **L.L.C., fka an Arizona limited liability**
16 **company now dba a Delaware limited**
17 **liability company, SLADE WILLIAMS AND**
18 **ASSOCIATES, L.L.C., an Arizona limited**
19 **liability company, MATHON FUND I,**
20 **L.L.C., an Arizona limited liability company,**
21 **MATHON FUND, L.L.C., fka an Arizona**
22 **limited liability company now dba a**
23 **Delaware limited liability company,**
24 **INTEGRITY101, L.L.C., an Arizona limited**
25 **liability company, INTEGRITY 201, L.L.C.,**
26 **an Arizona limited liability company,**
27 **INTEGRITY 301, L.L.C., and Arizona**
28 **limited liability company, INTEGRITY401,**
L.L.C., an Arizona limited liability company,
INTEGRITY 501, L.L.C., an Arizona limited
liability company, INTEGRITY 601, L.L.C.,
an Arizona limited liability company,
INTEGRITY 701, L.L.C., an Arizona limited
liability company, INTEGRITY 801, L.L.C.,
an Arizona limited liability company,
INTEGRITY 901, L.L.C., an Arizona limited
liability company, ROUND VALLEY
CAPITAL, L.L.C., an Arizona limited
liability company, W.S.F. – WORLD
SPORTS FANS, L.L.C., an Arizona limited
liability company, MILL CREEK, L.L.C., an
Arizona limited liability company,
BELLEVUE HOLDINGS, L.L.C., an

Case No. CV 2005-005484

MOTION FOR AN
EXPEDITED HEARING

(Assigned to the Honorable
Barry C. Schneider)

JABURG & WILK, P.C.
ATTORNEYS AT LAW
3200 NORTH CENTRAL AVENUE
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PHOENIX, ARIZONA 85012

1 Arizona limited liability company, OAK
2 HARBOR FINANCIAL, L.L.C., an Arizona
3 limited liability company, SW STRATEGIC,
4 WEALTH ADVISORS, L.L.C., an Arizona
5 limited liability company, EVERETT
6 CAPTIAL, L.L.C., an Arizona limited
7 liability company, CRE CAPITAL, L.L.C.,
8 an Arizona limited liability company,
9 MEZZANINE MANAGEMENT, L.L.C., an
10 Arizona limited liability company,
11 MEZZANINE FUND I, L.L.C., an Arizona
12 limited liability company, JONAS FUND I,
13 L.L.C., an Arizona limited liability company,
14 TEMPLAR FUND L.L.C., fka an Arizona
15 limited liability company now dba a
16 Delaware limited liability company,
17 MERCER ISLAND, L.L.C., an Arizona
18 limited liability company, CONNECTICUT
19 PROPERTIES, L.L.C., an Arizona limited
20 liability company, FIRST ATLANTA
21 INVESTMENTS, L.L.C., a Georgia limited
22 liability company, MM COLONIAL FUND,
23 L.L.C., a Delaware limited liability company,
24 SLADE CONSTRUCTION, L.L.C., an
25 Arizona limited liability company,

26 DUANE SLADE and JENNIFER SLADE,
27 husband and wife, GUY ANDREW
28 WILLIAMS and LISA WILLIAMS, husband
and wife,

Defendants.

19 James C. Sell, the court appointed Conservator in the above-referenced matter,
20 through counsel of record undersigned, hereby requests accelerated hearings on the (1)
21 *Motion to Authorize Settlement with TMC Partners, L.P.*; (“TMC Motion”) and (2) *Motion*
22 *to Authorize Conservator to File Bankruptcy Proceedings* (“Bankruptcy Motion”) which
23 have been filed contemporaneously herewith.

24 The Order appointing the Conservator anticipated that certain urgent matters would
25 arise within the Conservatorship proceeding which would require immediate action. To
26 address this concern, paragraphs 18 and 19, of the Conservatorship Order were
27
28

1 intentionally included to provide that the Conservator “may request relief on an expedited
2 basis” when he is compromising claims or liquidating Conservatorship assets.

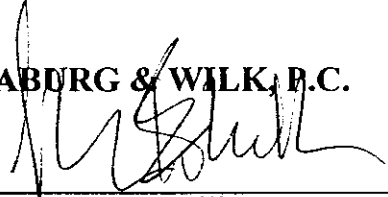
3 The need for the TMC Motion to be heard on an expedited basis arises from the
4 fact that additional earnest monies are scheduled to be paid on July 1, 2005, and the
5 borrower cannot commence obtaining funds to meet the closing of September 15, 2005,
6 until this matter has been approved by the Court. To assure timely closing, this matter
7 must be heard on an expedited basis.

8 As to the Bankruptcy Motion, the Bankruptcy Code provides certain “look back”
9 periods to establish voidable transfers. These periods are established by the filing date of
10 the proceedings. It is imperative that the proceedings be initiated immediately to preserve
11 recovery for the investors. In addition, there are several actions pending outside the
12 jurisdiction of this Court. The automatic stay of 11 U.S.C. §362 will immediately enjoin
13 any further action against the Conservatorship Estate.

14 Based upon the foregoing, the Conservator requests that this Court set a hearing on
15 an expedited basis, at the Court’s earliest convenience.

16 DATED this 24 day of June, 2005.

JABURG & WILK, P.C.



Lawrence E. Wilk
Attorneys for James C. Sell

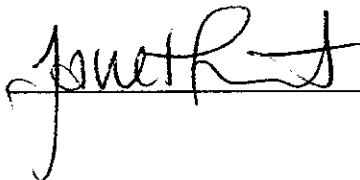
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22 **ORIGINAL** filed and **COPY**
23 of the foregoing hand-delivered this
24 24 day of June, 2005 to:

25 The Honorable Barry C. Schneider
26 MARICOPA COUNTY SUPERIOR COURT
101 West Jefferson, CCB 13A
Phoenix, Arizona 85003-2243

27 **COPIES** of the foregoing mailed
28 this 24 day of June, 2005 to:

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