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Electronically Filed: August 10, 2010

6 Attorneys for Chapter 7 Trustee,
William A. Leonard, Jr.
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8 UNITED STATES BANKRUPTCY COURT
9 DISTRICT OF NEVADA

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11 In re) CASE NO. BK-S-09-22035-LBR (Lead Case)
12 CONSOLIDATED RESORTS, INC., et al.,) (Jointly Administered with Case Nos.
13 Debtors.) 09-22030 through 09-22043)
14) Chapter 7

Affects:

- All Debtors)
- Destinations Unlimited, LLC, 09-22030)
- Consolidated Realty, Inc., 09-22031)
- Consolidated Media, LLC, 09-22032)
- CRI Travel Holdings, LLC, 09-22033)
- Consolidated Resorts Travel, LLC, 09-22034)
- Consolidated Resorts, Inc., 09-22035)
- Consolidated Maui, Inc., 09-22036)
- Consolidated Kona, Inc., 09-22037)
- Lahaina Ticket Company, Inc., 09-22038)
- Soleil PS, LLC, 09-22039)
- Soleil LV, LLC, 09-22040)
- Consolidated Tahiti, Inc., 09-22041)
- Consolidated Orlando, Inc., 09-22042)
- Consolidated Tickets, LLC, 09-22043)

LIMITED RESPONSE TO MOTION FOR RELIEF FROM STAY TO PROCEED AGAINST INSURANCE POLICY

Date: August 25, 2010
Time: 10:30 a.m.
Ctrm: LBR - Courtroom 1
Foley Federal Building
300 Las Vegas Blvd. South
Las Vegas, NV 89101
Judge: Hon. Linda B. Riegler

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24 William A. Leonard Jr., the Chapter 7 trustee (“Trustee”) in the Consolidated Resorts, Inc.
25 related bankruptcy cases, BK-S-09-22035-LBR (Lead Case), jointly administered with case numbers
26 09-22030 through 09-22043, hereby files his Limited Response to Motion for Relief from Stay to
27 Proceed Against Insurance Policy (“RS Motion”) filed by Randall and Josephine Gross.

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1 On July 22, 2010, Mr. and Mrs. Gross filed the RS Motion. The RS Motion arises from an
2 automobile accident in which Mr. and Mrs. Gross were riding in a vehicle owned by one of the
3 debtors herein (collectively, "Debtors") and driven by one of the Debtors' employees. Prior to the
4 Debtors' bankruptcy filings, Mr. and Mrs. Gross initiated in Nevada state court a lawsuit against the
5 Debtors and others asserting claims arising from the accident (Case No. A570230, Eighth Judicial
6 District, subsequently consolidated with Case No. A570185) (as consolidated, "State Court
7 Litigation"). Mr. and Mrs. Gross wish to proceed with the State Court Litigation.

8 The Trustee does not oppose the RS Motion to the extent that it seeks relief from the
9 automatic stay provided in Bankruptcy Code section 362 to allow Mr. and Mrs. Gross to prosecute
10 claims against any of the Debtors in the State Court Litigation and to collect upon any judgment in
11 their favor against policies, if any, insuring any of the Debtors -- but not against any other assets of
12 the Debtors or their bankruptcy estates. Subject to mutually acceptable documentation, the Trustee
13 is willing to enter into a written stipulation to that effect prior to any hearing on the RS Motion.

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15 Dated: August 10, 2010

SULLIVAN, HILL, LEWIN, REZ & ENGEL
A Professional Law Corporation

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18 By: /s/ James P. Hill
James P. Hill
Christine A. Roberts
Elizabeth E. Stephens
Attorneys for Chapter 7 Trustee,
William A. Leonard, Jr.