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26 *Mayer Hoffman McCann P.C.,*
27 *Charles A. and Eileen M. McLane,*
28 *and Joel B. and Donna L. Kramer*

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF ARIZONA

In re:

MORTGAGES, LTD.,

Debtor.

VICTIMS RECOVERY, LLC, an Arizona limited
liability company,

Plaintiffs,

v.

GREENBERG TRAUIG, LLP, et al.,

Defendants.

Chapter 11 Proceedings

Case No. 2:08-bk-07465-RJH

Adversary Case No. 2:10-ap-01214-RJH

**JOINDER IN GREENBERG
TRAURIG LLP'S MOTION FOR
SUBSTITUTION, JOINDER OR
RATIFICATION OF REAL PARTIES
IN INTEREST**

1 Defendants CBIZ, Inc., CBIZ MHM, LLC, Mayer Hoffman McCann, P.C., Charles A.
2 and Eileen M. McLane, and Joel B. and Donna L. Kramer ("Defendants") hereby join in
3 Greenberg Traurig LLP's Motion for Substitution, Joinder or Ratification of Real Parties in
4 Interest. ECF No. 81. As set forth in that Motion, the real parties in interest in this litigation are
5 eighteen individual investors (the "VR Investors") who created "Victims Recovery LLC" ("VR")
6 as a "temporary conduit for the collection for the eighteen individual VR Investors." ECF No. 81,
7 at 2. The assignment of the VR Investors' interests to VR was done simply for convenience and
8 was not made with consideration, making it invalid.

9 Further, without the joinder of the VR Investors as parties, Defendants face a significant
10 risk of prejudice. The VR Investors may attempt to resist Defendants' rightful access to full party
11 discovery from them. And there is no assurance that the outcome of this proceeding will have its
12 appropriate res judicata effect on the VR Investors' claims.

13 For these reasons, and for those reasons set forth more fully in Greenberg Traurig LLP's
14 Motion for Substitution, Joinder or Ratification of Real Parties in Interest, Defendants respectfully
15 request that the Court order that the VR Investors be substituted for "Victims Recovery LLC" as
16 the plaintiffs in this matter. Alternatively, the VR Investors should be joined as additional
17 plaintiffs or ordered to submit ratifications that they will be bound by the result of this case.

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1 Respectfully submitted this 4th day of November, 2010.

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3 By: /s/ Katherine V. Brown

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CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2010, I electronically transmitted the attached document to the Clerk's office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the CM/ECF registrants. I further certify that I served the attached document by U.S. mail on the following who are not registered participants of the CM/ECF System:

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