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11 Attorneys for Court-Appointed Receiver,  
12 MCA Financial Group, Ltd.

8 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
9 IN AND FOR THE COUNTY OF MARICOPA

11 KEITH DEERING, MARK RENBERG,  
12 and CHRIS LOMBARDO, derivatively  
13 on behalf of CHEYENNE MOUNTAIN  
14 GAMES, INC., a Nevada corporation;  
15 CHEYENNE MOUNTAIN  
16 ENTERTAINMENT, INC., a Nevada  
17 corporation,

15 Plaintiffs,

16 vs.

17 GARY WHITING and VICKI  
18 WHITING, husband and wife;  
19 GARVICK PROPERTIES, LLC, a  
20 Nevada limited liability company;  
21 GARRICK ENTERPRISES, LLC, a  
22 Nevada limited liability company;  
23 FRED GAGON and MARGARET  
24 GAGON, husband and wife; THE  
25 TREE, LLC, a limited liability  
26 company; IRA GAGON and JANE  
DOE GAGON, husband and wife;  
INCOME PROPERTIES, LLC, a  
Nevada limited liability company;  
VISTA RIDGE I & II, LLC, a Nevada  
limited liability company; ROBERT  
GUENTHER and JANE DOE  
GUENTHER, husband and wife;  
JAFFA PARTNERS, a Texas  
partnership; TODD ELLERING, a

Case No. CV2010-003106

(consolidated with Case No. CV2010-025559 and Case No. CV2010-006635 with this case pending)

**NOTICE OF ENTRY OF ORDER  
ESTABLISHING PROCEDURES AND  
DEADLINE (BAR DATE) FOR  
SUBMITTING CLAIMS AGAINST  
RECEIVERSHIP ESTATE**

(Assigned to the Hon. Arthur Anderson)

1 single individual; JIM BROWN, a  
2 single individual; TAE  
3 TECHNOLOGIES, INC., an Arizona  
4 corporation; JOHN BELLROSE and  
5 JANE DOE BELLROSE, husband and  
6 wife; JEFF HALL and JANE DOE  
7 HALL, husband and wife; SHANE  
8 RUDMAN and JANE DOE RUDMAN,  
9 husband and wife; WENDI HARDIN  
and JANE DOE HARDIN, wife and  
husband; ROB McKELL and NEDRA  
RONEY McKELL, husband and wife;  
MMOGULS, INC., a Nevada  
corporation; GARY HENRIE and JANE  
DOE HENRIE, husband and wife; and  
IMRAN SAFIULLA and JANE DOE  
SAFIULLA, husband and wife,

10 Defendants.

11 KARL HIATT, KEITH DEERING, each  
12 individually, and derivatively on behalf of  
13 Cheyenne Mountain Games, Inc., a  
14 Nevada corporation; Cheyenne Mountain  
Entertainment, Inc., a Nevada corporation  
and LOWELL ANDERSON,  
individually,

15 Plaintiffs,

16 vs.

17 EMPIRE ENTERPRISES UNLIMITED,  
18 LLC; GARVICK PROPERTIES, LLC, a  
19 Nevada Limited Liability Company;  
20 GARRICK ENTERPRISES, LLC, a  
21 Nevada Limited Liability Company;  
22 GARY WHITING and VICKI  
WHITING, husband and wife; and DOES  
1 through 50, Inclusive,

22 Defendants.

23 DAVID ROBERTS, SAM  
24 DALEMBERT, and HETAL SHAH,  
25 M.D., derivatively on behalf of Cheyenne  
26 Mountain Games, Inc., a Nevada  
corporation,

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Plaintiff,

v.

DARK COMET GAMES, LLC, an  
Arizona limited liability company;  
FRESH START STUDIOS, LLC, an  
Arizona limited liability company; KARL  
and JANE DOE HIATT, husband and  
wife; MARK and JANE DOE  
RENNBERG, husband and wife; CHRIS  
and JANE DOE LOMBARDO, husband  
and wife; and HARLAN JAMES  
BROWN, II and JANE DOE BROWN,  
husband and wife; and TIMOTHY and  
MARY JENSON, husband and wife,

Defendants.

**TO: ALL CREDITORS, INTEREST HOLDERS AND OTHER PARTIES-IN-INTEREST THAT MAY HOLD A CLAIM AGAINST ONE OR MORE OF THE FOLLOWING ENTITIES:**

- Cheyenne Mountain Entertainment, Inc.
- Cheyenne Mountain Games, Inc.
- Cheyenne Mountain Productions, Inc.
- Cheyenne Mountain Software, Inc.
- Firesky, LLC
- Stargate Worlds LLC
- Superstition Studios LLC
- Handcranked Games LLC
- Mass Illusions LLC
- Knowledge Relay, LLC
- Cine Mundo, LLC
- World Games, Inc.

PLEASE TAKE NOTICE THAT **JANUARY 2, 2012** HAS BEEN ESTABLISHED AS THE DEADLINE TO SUBMIT ANY AND ALL CLAIMS YOU MAY HOLD AGAINST ONE OR MORE OF THE ENTITIES LISTED ABOVE. FAILURE TO

1 TIMELY SUBMIT YOUR CLAIM ON OR BEFORE THAT DATE MAY RESULT IN  
2 YOUR CLAIM BEING FOREVER BARRED, AND WILL PRECLUDE YOU FROM  
RECEIVING ANY DISTRIBUTION ON ACCOUNT OF SUCH CLAIM(S) FROM THE  
LIQUIDATED ASSETS OF THE RECEIVERSHIP ESTATE.

3 PLEASE REVIEW THIS NOTICE AND EXHIBIT “1” ATTACHED HERETO TO  
4 DETERMINE WHETHER YOU SHOULD SUBMIT A CLAIM.

5 1. On March 15, 2010, this Court appointed Edward Burr as receiver to take  
6 over the assets, affairs, management, operation and control of the following entities:

- 7 • Cheyenne Mountain Entertainment, Inc.
- 8 • Cheyenne Mountain Games, Inc.
- 9 • Cheyenne Mountain Productions, Inc.
- 10 • Cheyenne Mountain Software, Inc.
- 11 • Firesky, LLC
- 12 • Stargate Worlds LLC
- 13 • Superstition Studios LLC
- 14 • Handcranked Games LLC
- 15 • Mass Illusions LLC
- 16 • Knowledge Relay, LLC
- 17 • Cine Mundo, LLC
- 18 • World Games, Inc.

(collectively, the “Cheyenne Entities”).

19 2. On November 8, 2010, this Court entered an Order appointing MCA  
20 Financial Group, Ltd., by and through Morris C. Aaron (the “Receiver”) as substitute  
21 receiver for Mr. Burr to take over control of the assets and operations of the Cheyenne  
22 Entities.

23 3. On November 1, 2010, prior to the Receiver’s appointment, MGM  
24 Interactive, Inc. (“MGM”) gave notice that it was terminating the license held by the  
25 Cheyenne Entities for the “Stargate” intellectual property effective November 15, 2010.  
26 The Receiver’s subsequent efforts to obtain a new license from MGM to use the  
“Stargate” intellectual property were unsuccessful.

4. In light of MGM’s unwillingness to issue a new license, the Receiver has  
determined that an orderly liquidation of the receivership estate’s assets is in the best  
interest of the Cheyenne Entities’ creditors.

1           5. As a first step in the liquidation process, on October 17, 2011 the Court  
2 entered the “Order Establishing Procedures and Deadline (Bar Date) for Submitting  
3 Claims Against Receivership Estate” (“Order Fixing Bar Date”). Pursuant to the terms of  
4 the Order Fixing Bar Date, **January 2, 2012** is the deadline (the “Bar Date”) by which  
5 any and all persons asserting a claim against one or more of the Cheyenne Entities listed  
6 above must submit to the Receiver a signed and completed proof of claim form (“Claim  
7 Form”).<sup>1</sup> A copy of the Order Fixing Bar Date is attached hereto as Exhibit “1” to this  
8 Notice.

9           6. The Claim Form for you to use to submit your claim is enclosed with this  
10 Notice.

11           7. Any claimant with a claim against one or more of the Cheyenne Entities  
12 who fails to timely submit a completed and signed Claim Form and all documentation  
13 supporting such claim shall be forever barred from asserting such claim in any manner  
14 against the assets of the receivership estate, and shall be precluded from participating in  
15 the liquidation process and receiving any distribution on account of such claim from the  
16 liquidated assets of the receivership estate.

17           8. You must indicate on the Claim Form which of the Cheyenne Entities your  
18 claim is asserted against by checking the appropriate box(es).

19           9. If you contend more than one of the Cheyenne Entities is liable for your  
20 claim, please check the appropriate boxes on the Claim Form to indicate all of the  
21 Cheyenne Entities you assert are liable for your claim.

22           10. If you wish to submit more than one claim, please make a copy of the Claim  
23 Form enclosed herewith and submit each claim (with the appropriate supporting  
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25 <sup>1</sup> Pursuant to Paragraph B of the Order Fixing Bar Date, the Bar Date is forty-five (45) days from  
26 the Receiver’s service of this Notice. Because this Notice is being served on November 18, 2011,  
the Bar Date has been established as January 2, 2012, the date that is forty-five days from  
November 18, 2011.

1 documentation) separately.

2 11. All persons or entities seeking to submit a claim must assure that the  
3 completed and signed Claim Form, and all documentation supporting such claim, is  
4 actually **received** by the Receiver on or before the Bar Date. Completed and signed  
5 Claims Forms and supporting documentation must be delivered in person or mailed to the  
6 Receiver at the following address:

7 MCA Financial Group, Ltd.  
8 Attn: Karilyn Krahe  
9 4909 North 44th Street  
Phoenix, AZ 85018  
(602) 710-2512

10 12. Claim Forms will be deemed submitted only when they are actually  
11 received by the Receiver.

12 13. Claim Forms sent to any person or entity other than the Receiver will be  
13 deemed not properly or timely submitted.

14 14. **DO NOT FILE YOUR CLAIM FORM WITH THE SUPERIOR**  
15 **COURT OR SEND IT TO THE JUDGE PRESIDING OVER THIS MATTER.**

16 DATED this 18th day of November, 2011.

17 SNELL & WILMER L.L.P.

18  
19 By: /s/ DFE (#025986)

20 Christopher H. Bayley  
21 Donald F. Ennis  
22 One Arizona Center  
23 400 E. Van Buren  
24 Phoenix, AZ 85004-2202  
25 Attorneys for Court-Appointed Receiver, MCA  
26 Financial Group, Ltd.

**EXHIBIT 1**

10/17/11 FILED @ 3:46pm  
MICHAEL K. JEANES, Clerk  
By *L. Nixon*  
L. Nixon, Deputy

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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
IN AND FOR THE COUNTY OF MARICOPA

**Snell & Wilmer**

LLP  
LAW OFFICES  
One Arizona Center, 850 N. Van Buren  
Phoenix, Arizona 85004-2302  
(602) 392-6000

KEITH DEERING, MARK RENBERG,  
and CHRIS LOMBARDO, derivatively  
on behalf of CHEYENNE MOUNTAIN  
GAMES, INC., a Nevada corporation;  
CHEYENNE MOUNTAIN  
ENTERTAINMENT, INC., a Nevada  
corporation,

Plaintiffs,

vs.

GARY WHITING and VICKI  
WHITING, husband and wife;  
GARVICK PROPERTIES, LLC, a  
Nevada limited liability company;  
GARRICK ENTERPRISES, LLC, a  
Nevada limited liability company;  
FRED GAGON and MARGARET  
GAGON, husband and wife; THE  
TREE, LLC, a limited liability  
company; IRA GAGON and JANE  
DOE GAGON, husband and wife;  
INCOME PROPERTIES, LLC, a  
Nevada limited liability company;  
VISTA RIDGE I & II, LLC, a Nevada  
limited liability company; ROBERT  
GUENTHER and JANE DOE  
GUENTHER, husband and wife;  
JAFFA PARTNERS, a Texas  
partnership; TODD ELLERING, a

Case No. CV2010-003106

(consolidated with Case No. CV2010-025559 and Case No. CV2010-006635 with this case pending)

**ORDER ESTABLISHING  
PROCEDURES AND DEADLINE  
(BAR DATE) FOR SUBMITTING  
CLAIMS AGAINST RECEIVERSHIP  
ESTATE**

(Assigned to the Hon. Arthur Anderson)

1 single individual; JIM BROWN, a  
2 single individual; TAE  
3 TECHNOLOGIES, INC., an Arizona  
4 corporation; JOHN BELLROSE and  
5 JANE DOE BELLROSE, husband and  
6 wife; JEFF HALL and JANE DOE  
7 HALL, husband and wife; SHANE  
8 RUDMAN and JANE DOE RUDMAN,  
9 husband and wife; WENDI HARDIN  
10 and JANE DOE HARDIN, wife and  
11 husband; ROB McKELL and NEDRA  
12 RONEY McKELL, husband and wife;  
13 MMOGULS, INC., a Nevada  
14 corporation; GARY HENRIE and JANE  
15 DOE HENRIE, husband and wife; and  
16 IMRAN SAFIULLA and JANE DOE  
17 SAFIULLA, husband and wife,

Defendants.

11 KARL HIATT, KEITH DEERING, each  
12 individually, and derivatively on behalf of  
13 Cheyenne Mountain Games, Inc., a  
14 Nevada corporation; Cheyenne Mountain  
15 Entertainment, Inc., a Nevada corporation  
16 and LOWELL ANDERSON,  
17 individually,

Plaintiffs,

vs.

17 EMPIRE ENTERPRISES UNLIMITED,  
18 LLC; GARVICK PROPERTIES, LLC, a  
19 Nevada Limited Liability Company;  
20 GARRICK ENTERPRISES, LLC, a  
21 Nevada Limited Liability Company;  
22 GARY WHITING and VICKI  
23 WHITING, husband and wife; and DOES  
24 1 through 50, Inclusive,

Defendants.

23 DAVID ROBERTS, SAM  
24 DALEMBERT, and HETAL SHAH,  
25 M.D., derivatively on behalf of Cheyenne  
26 Mountain Games, Inc., a Nevada  
corporation,

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Plaintiff,  
  
v.  
  
DARK COMET GAMES, LLC, an  
Arizona limited liability company;  
FRESH START STUDIOS, LLC, an  
Arizona limited liability company; KARL  
and JANE DOE HIATT, husband and  
wife; MARK and JANE DOE  
RENNBERG, husband and wife; CHRIS  
and JANE DOE LOMBARDO, husband  
and wife; and HARLAN JAMES  
BROWN, II and JANE DOE BROWN,  
husband and wife; and TIMOTHY and  
MARY JENSON, husband and wife,  
  
Defendants.

Upon consideration of the “Receiver’s Motion for Order Establishing Procedures and Deadline (Bar Date) for Submitting Claims against Receiver Estate” (“Motion”)<sup>1</sup> filed by MCA Financial Group, Ltd., by and through Morris C. Aaron, the Court-appointed receiver (the “Receiver”) for Cheyenne Mountain Entertainment, Inc. (“CME”), Cheyenne Mountain Games, Inc. (“CMG”), and their wholly-owned subsidiaries and other entities and affiliates for which CMG or CME is the managing member or otherwise has a controlling ownership interest, consisting of the following:

- Cheyenne Mountain Productions, Inc.
- Cheyenne Mountain Software, Inc.
- Firesky, LLC
- Stargate Worlds LLC
- Superstition Studios LLC
- Handcranked Games LLC
- Mass Illusions LLC
- Knowledge Relay, LLC
- Cine Mundo, LLC
- World Games, Inc.

(collectively with CME and CMG, the “Cheyenne Entities”), and good cause appearing therefor,

<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meaning given to those terms in the Motion.

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The Court hereby FINDS that:

1. The relief requested by the Receiver in the Motion is in the best interests of the Cheyenne Entities, their creditors, interest holders and other parties in interest;
2. Establishment of the Bar Date is a necessary prerequisite to the Receiver's orderly liquidation of the receivership estate;
3. Due and proper notice of the Motion has been given and no further notice is necessary or required;
4. Pursuant to Rule 7.1 of the Arizona Rules of Civil Procedure, all parties who did not file an answering memorandum to the Motion are deemed to have consented to the relief requested therein;
5. Forty-five (45) days after the Receiver's service of the Bar Date Notice and this Order is a reasonable time for creditors, interest holders and other parties in interest of the Cheyenne Entities to submit claims to the Receiver; and
6. The Bar Date Notice, substantially in the form of Exhibit F to the Motion, and the proposed procedures related thereto are reasonably calculated to give all parties in interest actual notice of the Bar Date.

Based on the foregoing and good cause appearing therefor:

**IT IS HEREBY ORDERED, ADJUDGED AND DECREED that:**

- A. The Motion is granted in its entirety;
- B. All creditors, interest holders and parties in interest purporting to hold one or more claims against the Cheyenne Entities must submit to the Receiver a completed and signed Claim Form along with all documentation supporting the claim no later than forty-five (45) days after the date of service of the Bar Date Notice and this Order, as reflected below (the "Bar Date"), such that the Claim Form is actually received by the Receiver on or before the Bar Date;

///

1 C. Completed and signed Claim Forms must be delivered in person or mailed  
2 to the Receiver at the following address:

3 MCA Financial Group, Ltd.  
4 Attn: Karrylyn Krahe  
4909 North 44th Street  
5 Phoenix, AZ 85018  
(602) 710-2512

6 D. Any creditor, interest holder or party in interest with a claim as described  
7 above who fails to timely submit a completed and signed Claim Form to the Receiver on  
8 or before the Bar Date shall be prohibited from (i) asserting such claim (or submitting a  
9 completed Claim Form with respect thereof) in any manner against the receivership estate;  
10 (ii) participating in the above-captioned receivership case with respect to any plan of  
11 liquidation proposed by the Receiver for the Court's consideration and approval; and (iii)  
12 receiving any distribution of the proceeds of that liquidation;

13 E. The form of the Bar Date Notice shall be substantially in the form of  
14 Exhibit F to the Motion, with the exception that the Receiver is authorized to insert into  
15 the Bar Date Notice (i) a date certain by which Claim Forms must be submitted that is  
16 forty-five (45) days from the date of the Receiver's service of the Bar Date Notice and this  
17 Order; and (ii) the date that this Order is signed;

18 F. The Receiver or its agents shall serve the Bar Date Notice, this Order, and a  
19 Claim Form via first class mail on all known creditors, interest holders and other parties in  
20 interest of the Cheyenne Entities, for whom the Receiver has mailing addresses; and

21 G. The Receiver or its agents shall post a description of the Bar Date, the  
22 procedure for submitting claims, and links to the Bar Date Notice, the Order Fixing Bar

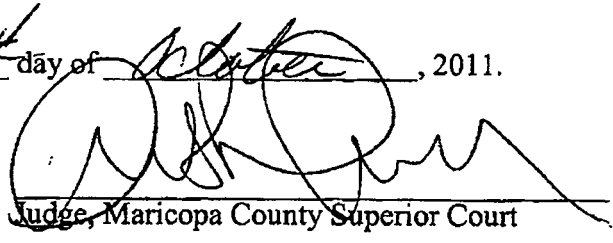
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**Snell & Wilmer**  
L.P.  
LAW OFFICES  
One Arizona Center, 400 E. Van Buren  
Phoenix, Arizona 85004-2202  
(602) 382-6000

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Date, and the Claim Form on the website formally used by the Cheyenne Entities:  
<http://www.cheyenneme.com>.

SO ORDERED this 15<sup>th</sup> day of October, 2011.



Judge, Maricopa County Superior Court

**ARTHUR T. ANDERSON**

*CU 2010-003106*