

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

In re:)	Chapter 11
IMH FINANCIAL CORPORATION,)	Case No. 20-11858 (BLS)
Debtor. ¹)	
)	
)	
)	

**NOTICE OF HEARING TO CONSIDER APPROVAL OF DISCLOSURE STATEMENT
FOR CHAPTER 11 PLAN OF IMH FINANCIAL CORPORATION**

PLEASE TAKE NOTICE THAT on July 23, 2020, IMH Financial Corporation, the debtor and debtor-in-possession in the above-captioned chapter 11 case (the “Debtor”), filed the *Disclosure Statement Dated July 23, 2020 for Chapter 11 Plan of IMH Financial Corporation* [D.I. 36] (as may be amended, modified, or supplemented, the “Disclosure Statement”), and the *Chapter 11 Plan of IMH Financial Corporation* [D.I. 35] (as may be amended, modified, or supplemented, the “Plan”).²

PLEASE TAKE FURTHER NOTICE that a hearing (the “Hearing”) to consider entry of an Order approving the Disclosure Statement and the procedures by which the Debtor will solicit votes to accept or reject the Plan (the “Solicitation Procedures”) will be held before the Honorable Christopher Sontchi, United States Bankruptcy Judge, in the United States Bankruptcy Court for the District of Delaware (the “Court”), 824 North Market Street, 5th Floor, Courtroom #6, Wilmington, Delaware 19801, on **September 1, 2020 at 10:00 a.m. (EST)**.

PLEASE TAKE FURTHER NOTICE that the Hearing may be adjourned from time to time without further notice to parties in interest other than by an announcement in Court of such adjournment on the date scheduled for the Hearing or as indicated in any notice of agenda of matters scheduled for hearing filed by the Debtor with the Court.

PLEASE TAKE FURTHER NOTICE that any party in interest wishing to obtain a copy of the Disclosure Statement or the Plan should contact Donlin, Recano & Company, Inc., the Debtor’s proposed voting agent, in writing at Donlin, Recano & Company, Inc., Re: IMH Financial Corporation, P.O. Box 199043, Blythebourne Station, Brooklyn, NY 11219, by telephone at 1-877-534-8310; or by email at imhinfo@donlinrecano.com with a reference to “IMH Financial Corporation” in the subject line.

¹ The Debtor in this chapter 11 case, along with the last four digits of the Debtor’s federal tax identification number, as applicable, is IMH Financial Corporation (7126). The location of the Debtor’s corporate headquarters is 7001 N. Scottsdale Rd., Scottsdale, Arizona 85253.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Disclosure Statement or the Plan, as applicable, or as the context otherwise requires.

PLEASE TAKE FURTHER NOTICE that objections, if any, to approval of the Disclosure Statement or the Solicitation Procedures must (i) be made in writing; (ii) state the name and address of the objecting party and the nature of the claim or interest of such party; (iii) state with particularity the legal and factual basis and nature of any objection; and (iv) be filed with the Bankruptcy Court, together with proof of service, and served so that they are received on or before **August 25, 2020 at 4:00 p.m. (EST)** by the following parties: (i) IMH Financial Corporation, 7001 N Scottsdale Rd., Scottsdale, AZ 85253, Attn: Jonathan Brohard, Executive Vice President and General Counsel, Tel: (480) 840-8400, e-mail: JBrohard@imhfc.com; (ii) counsel to the Debtor, Snell & Wilmer L.L.P., One Arizona Center, 400 E Van Buren St., Ste. 1900, Phoenix, AZ, Attn: Christopher H. Bayley, Esq., Tel: (602) 382-6214, e-mail: cbayley@swlaw.com, (iii) Delaware counsel to the Debtor, Ashby & Geddes, 500 Delaware Ave., 8th Floor, Wilmington, DE 19801, Attn: William P. Bowden, Esq., Tel: (302) 654-1888, e-mail: WBowden@ashbygeddes.com; (iv) counsel to JPMorgan Chase Funding Inc., (a) Hahn & Hessen, 488 Madison Ave., #14, New York, NY 10022 (Attn. Jeffrey L. Schwartz, Esq.; jschwartz@hahnhausen.com and Joshua I. Divack, Esq.; jdivack@hahnhausen.com); and (b) Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, P.O. Box 2087, Wilmington, DE 19899 (Attn. Adam G. Landis, Esq.; landis@lrclaw.com and Richard S. Cobb, Esq.; cobb@lrclaw.com); (v) counsel to Juniper Investment Advisors, LLC, Munger Tolles & Olson, 350 S Grand Ave., 50th Floor, Los Angeles, CA 90071, Attn: C. David Lee, Esq., Tel: (213) 683-9285, e-mail: David.Lee@mto.com; and (vi) the Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801, Attn: Benjamin Hackman, Esq.; Benjamin.A.Hackman@usdoj.gov and Linda Richenderfer, Esq.; Linda.Richenderfer@usdoj.gov. Any objection that is not timely filed and served may not be considered by the Court.

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Dated: July 24, 2020

ASHBY & GEDDES P.A.

By: /s/ William P. Bowden

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