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6 Attorney for Creditors Milton Coulter
7 Cathrine Coulter and Jane Katheryn Coulter
8 as trustee for the Jane Katheryn Coulter Revokable Trust

9 **IN THE UNITED STATES BANKRUPTCY COURT**
10 **FOR THE DISTRICT OF ARIZONA**

11 In re:) Case Nos.: 03-03803-PHX RJH
12) 03-03799-PHX RJH
13 AMERICAN NATIONAL MORTGAGE)
14 PARTNERS, LLC,) (Chapter 11 Case)
15 Debtor,)

16 **OBJECTION TO DEBTORS’**
17 **DISCLOSURE STATEMENT AND PLAN**
18 **OF REORGANIZATION**

19 In re:)
20 ANMP 74th ST., LLC,)
21 Debtor.)

22 TO: THE HONORABLE RANDOLPH J. HAINES, BANKRUPTCY JUDGE

23 Milton Coulter, Cathrine Coulter and Jane Katheryn Coulter as trustee for the Jane Katheryn Coulter
24 Revokable Trust, (hereinafter collectively referred to as the “Creditors”), by its undersigned counsel, hereby
25 objects to the Plan of Reorganization dated July 15, 2005 (the “Plan”) filed by AMERICAN NATIONAL
26 MORTGAGE PARTNERS, LLC and ANMP 74th ST., LLC, the debtor, The Official Unsecured Creditor’s
27 Committee and the Receiver (hereinafter collectively referred to as the “Proponent”), on the ground that the
28 Plan fails to comply with 11 U.S.C. § 1129. The creditor’s specific objections are as follows:

1. The Debtor’s Plan places the Creditors’ claims in Class 4, (Subordinated Claims of Insiders, Affiliates and Ineligible Investor). Under the Plan, the Class 4 claims are subordinated to Class 3 and will not be paid.

2. The Debtor’s Plan wrongly classifies the Creditors as an Insider, Affiliate, pursuant to 11 U.S.C. § 101(2) and (31), and/or Ineligible Investor as defined by the Plan in Section 2.2

3. The Creditors do not own 20% or more of the outstanding stock, membership interests, or other security, in the Debtors nor did they in any way run a portion of the Debtors’ business.

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By: /s/ David T. Bonfiglio