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Attorneys for Robert J. Lucas, Lucas Development Corp., a California corporation, Robert J. Lucas, as Trustee of the R. and J. Lucas Living Trust created pursuant to Trust Instrument dated September 11, 1980, Robert J. Lucas, Trustee of the R + J Lucas Trust A, Robert K. Lucas, Trustee of the R + M Lucas Revocable Trust established July 28, 1993 and Anamesa Properties, LLC, a California limited liability company

UNITED STATES BANKRUPTCY COURT

CENTRAL DIVISION OF CALIFORNIA

SANTA ANA DIVISION

In re JAMES J. GIANULIUS and CAMEO HOMES, a California corporation, Debtors and Debtors-in-Possession.	CASE NO. SA 08-13150-RK [Substantially Consolidated With: CASE NO. 8:08-bk-13151-RK] Chapter 11 **LUCAS ENTITIES CONDITIONAL SUPPORT OF DEBTORS' MOTION FOR ORDER APPROVING DEBTORS' FOURTH AMENDED CHAPTER 11 REORGANIZATION PLAN DATED MAY 27, 2010** **Plan Confirmation Hearing Date**: Date: July 19, 2010 Time: 11:45 a.m. Place: 411 W. Fourth St. Santa Ana, CA 92701 Courtroom 5D

TO THE HONORABLE ROBERT KWAN UNITED STATES BANKRUPTCY JUDGE AND ALL INTERESTED PARTIES:

I.

INTRODUCTION AND BACKGROUND SUMMARY

Robert J. Lucas ("Lucas"), Lucas Development, a California corporation ("Lucas Corp."), Robert J. Lucas as Trustee of the R. and J. Lucas Living Trust Created Pursuant to Trust instrument dated September 11, 1980 ("Lucas Trust"), Robert J. Lucas, Trustee of the R + J Lucas Trust A ("Trust A"), Robert K. Lucas, trustee of the R + M Lucas Revocable Trust established July 28, 1993 ("K Lucas Trust"), and Anamesa Properties, LLC, a California limited liability company ("Anamesa") (collectively at times "Lucas Entities") parties in interest of the consolidated bankruptcy estates of James C. Gianulius and Cameo Homes (collectively "Debtors") hereby files its Conditional Support of Debtors' Motion for Order Approving Debtors' Fourth Amended Plan of Reorganization (Dated May 27, 2010) ("Plan") and other relief.

The Lucas Entities are supportive of Debtors' reorganization efforts and have worked closely with both the Debtors' and Committees' professionals in preparing documentation which meets the parties' common objectives[1].

As part of plan confirmation, Debtors and the Committee are seeking approval of various Plan Documents to secure payment to the unsecured creditors. Of particular importance is the Security Agreement (Exhibit E to the Plan) that defines what the collateral is, and incorporates certain findings ("Findings") that will be requested at the hearing on plan confirmation. The notice of the hearing on plan confirmation ("Plan Notice") specifically provided that the Debtors will be requesting such Findings in the Plan Confirmation Order. Provided the Plan Confirmation Order contains the Findings, the Lucas Entities do not object.

Finally, the Plan Documents have been extensively negotiated. The Lucas Entities request that Debtors and Committee agree that the Plan Documents can in no way be modified, changed or amended without the express consent of the Lucas Entities or order of this Court. This protection is important so that the Lucas Entities can verify that proposed changes would not be in contravention of applicable loan documentation, or the partnership and operating agreements.

[1] The Lucas entities understand that the Debtors may be modifying documents with technical amendments to which the Lucas Entities reserve their right to respond.

II.

CONCLUSION

In sum, the Debtors and Committee have engaged in productive negotiations with the Lucas Entities concerning the substantial amounts and interests involved. The Lucas Entities support confirmation of Debtor's Plan provided that the Findings in the Plan Notice and Security Agreement are included in the Plan Confirmation Order and that none of the Plan Documents are in any way changed without either the consent of the Lucas Creditors or this Court's Order.

DATED: July 1, 2010

GOE & FORSYTHE, LLP

By: /s/Robert P. Goe
Robert P. Goe
Attorneys for the Lucas Entities

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 18101 Von Karman Avenue, Suite 510, Irvine, CA 92612.

A true and correct copy of the foregoing document described as **LUCAS ENTITIES CONDITIONAL SUPPORT OF DEBTORS' MOTION FOR ORDER APPROVING DEBTORS' FOURTH AMENDED CHAPTER 11 REORGANIZATION PLAN DATED MAY 27, 2010** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF") – Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On July 2, 2010, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

☒ Service information continued on attached page

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL(indicate method for each person or entity served)**:** On July 2, 2010, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on July 2, 2010, I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on the judge will be completed no later than 24 hours after the document is filed.

The Honorable Robert N. Kwan, U.S. Bankruptcy Court, 411 W. Fourth St., Suite 5165 Santa Ana, CA 92701 (hand delivered)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

July 2, 2010	Kerry A. Murphy	/s/Kerry A. Murphy
Date	*Type Name*	*Signature*

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")

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