

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In Re:

SUFFOLK READY MIX, LLC,

Debtor.

Chapter 7
Case No. 09-75473

MOTION FOR RELIEF FROM AUTOMATIC STAY

Secured Lease Creditor Key Equipment Finance Inc. ("Key"), through its attorneys Lemery Greisler LLC, respectfully moves the Court for an Order pursuant to 11 U.S.C. §362 (d)(1)(2) for relief from the Automatic Stay and, in support of its motion, states as follows:

PARTIES

1. Debtors Suffolk Ready Mix, LLC ("Debtor") filed its Voluntary Petition for Relief under Chapter 11 of the United States Bankruptcy Code in this Court on July 24, 2009.
2. The case was converted to one under Chapter 7 under the United States Bankruptcy Code on August 9, 2010.
3. R. Kenneth Barnard, Esq. is the duly appointed Chapter 7 Trustee.
4. Key is a secured creditor of the Debtor pursuant to a Vehicle Finance Agreement under which Key financed the Debtor's purchase of a 2007 Heil Dry bulk Trailer. As of the date of filing, Key was owed \$55,606.16. Evidence of Key's claim and the perfection of its lien is attached hereto as Exhibit "A."

Sample Motion To Lift Automatic Stay

Siddappa N.Byrareddy



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The Top Books of the Year Sample Motion To Lift Automatic Stay The year 2023 has witnessed a remarkable surge in literary brilliance, with numerous compelling novels enthralling the hearts of readers worldwide. Lets delve into the realm of top-selling books, exploring the fascinating narratives that have captivated audiences this year. Sample Motion To Lift Automatic Stay : Colleen Hoover's "It Ends with Us" This heartfelt tale of love, loss, and resilience has captivated readers with its raw and emotional exploration of domestic abuse. Hoover skillfully weaves a story of hope and healing, reminding us that even in the darkest of times, the human spirit can succeed. Sample Motion To Lift Automatic Stay : Taylor Jenkins Reids "The Seven Husbands of Evelyn Hugo" This captivating historical fiction novel unravels the life of Evelyn Hugo, a Hollywood icon who defies expectations and societal norms to pursue her dreams. Reids captivating storytelling and compelling characters transport readers to a bygone era, immersing them in a world of glamour, ambition, and self-discovery. Discover the Magic : Delia Owens "Where the Crawdads Sing" This mesmerizing coming-of-age story follows Kya Clark, a young woman who grows up alone in the marshes of North Carolina. Owens weaves a tale of resilience, survival, and the transformative power of nature, entrancing readers with its evocative prose and mesmerizing setting. These popular novels represent just a fraction of the literary treasures that have emerged in 2023. Whether you seek tales of romance, adventure, or personal growth, the world of literature offers an abundance of captivating stories waiting to be discovered. The novel begins with Richard Papen, a bright but troubled young man, arriving at Hampden College. Richard is immediately drawn to the group of students who call themselves the Classics Club. The club is led by Henry Winter, a brilliant and charismatic young man. Henry is obsessed with Greek mythology and philosophy, and he quickly draws Richard into his world. The other members of the Classics Club are equally as fascinating. Bunny Corcoran is a wealthy and spoiled young man who is always looking for a good time. Charles Tavis is a quiet and reserved young man who is deeply in love with Henry. Camilla Macaulay is a beautiful and intelligent young woman who is drawn to the power and danger of the Classics Club. The students are all deeply in love with Morrow, and they are willing to do anything to please him. Morrow is a complex and mysterious figure, and he seems to be manipulating the students for his own purposes. As the students become more involved with Morrow, they begin to commit increasingly dangerous acts. The Secret History is an exceptional and thrilling novel that will keep you guessing until the very end. The novel is a warning tale about the dangers of obsession and the power of evil.

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Table of Contents Sample Motion To Lift Automatic Stay

1. Understanding the eBook Sample Motion To Lift Automatic Stay
 - The Rise of Digital Reading Sample Motion To Lift Automatic Stay
 - Advantages of eBooks Over Traditional Books
2. Identifying Sample Motion To Lift Automatic Stay
 - Exploring Different Genres
 - Considering Fiction vs. Non-Fiction
 - Determining Your Reading Goals
3. Choosing the Right eBook Platform
 - Popular eBook Platforms
 - Features to Look for in an Sample Motion To Lift Automatic Stay
 - User-Friendly Interface
4. Exploring eBook Recommendations from Sample Motion To Lift Automatic Stay
 - Personalized Recommendations
 - Sample Motion To Lift Automatic Stay User Reviews and Ratings
 - Sample Motion To Lift Automatic Stay and Bestseller Lists
5. Accessing Sample Motion To Lift Automatic Stay Free and Paid eBooks
 - Sample Motion To Lift Automatic Stay Public Domain eBooks
 - Sample Motion To Lift Automatic Stay eBook Subscription Services
 - Sample Motion To Lift Automatic Stay Budget-Friendly Options
6. Navigating Sample Motion To Lift Automatic Stay eBook Formats
 - ePub, PDF, MOBI, and More
 - Sample Motion To Lift Automatic Stay Compatibility with Devices
 - Sample Motion To Lift Automatic Stay Enhanced eBook Features
7. Enhancing Your Reading Experience
 - Adjustable Fonts and Text Sizes of Sample Motion To Lift Automatic Stay
 - Highlighting and Note-Taking Sample Motion To Lift Automatic Stay
 - Interactive Elements Sample Motion To Lift Automatic Stay
8. Staying Engaged with Sample Motion To Lift Automatic Stay

- Joining Online Reading Communities
- Participating in Virtual Book Clubs
- Following Authors and Publishers Sample Motion To Lift Automatic Stay
- 9. Balancing eBooks and Physical Books Sample Motion To Lift Automatic Stay
 - Benefits of a Digital Library
 - Creating a Diverse Reading Collection Sample Motion To Lift Automatic Stay
- 10. Overcoming Reading Challenges
 - Dealing with Digital Eye Strain
 - Minimizing Distractions
 - Managing Screen Time
- 11. Cultivating a Reading Routine Sample Motion To Lift Automatic Stay
 - Setting Reading Goals Sample Motion To Lift Automatic Stay
 - Carving Out Dedicated Reading Time
- 12. Sourcing Reliable Information of Sample Motion To Lift Automatic Stay
 - Fact-Checking eBook Content of Sample Motion To Lift Automatic Stay
 - Distinguishing Credible Sources
- 13. Promoting Lifelong Learning
 - Utilizing eBooks for Skill Development
 - Exploring Educational eBooks
- 14. Embracing eBook Trends
 - Integration of Multimedia Elements
 - Interactive and Gamified eBooks

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