

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

Ensheng Dong

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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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