

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In Re:

SUFFOLK READY MIX, LLC,  
  
Debtor.

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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

**Marco Cascella**

A red circular graphic with a gradient, appearing as a semi-circle or a partial circle, located to the right of the author's name.

**Sample Motion To Lift Automatic Stay:**

## Whispering the Techniques of Language: An Mental Journey through **Sample Motion To Lift Automatic Stay**

In a digitally-driven world where screens reign supreme and immediate connection drowns out the subtleties of language, the profound secrets and emotional nuances concealed within phrases often get unheard. However, nestled within the pages of **Sample Motion To Lift Automatic Stay** a captivating fictional prize pulsating with natural feelings, lies an extraordinary journey waiting to be undertaken. Written by a talented wordsmith, this marvelous opus attracts viewers on an introspective trip, delicately unraveling the veiled truths and profound affect resonating within the very material of every word. Within the psychological depths of the poignant review, we can embark upon a honest exploration of the book is core themes, dissect its interesting publishing model, and yield to the strong resonance it evokes deep within the recesses of readers hearts.

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