

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

Cara O'Neill

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 Secrets of Language: An Emotional Quest through **Sample Motion To Lift Automatic Stay**

In a digitally-driven world wherever screens reign great and instant conversation drowns out the subtleties of language, the profound techniques and psychological nuances concealed within phrases frequently get unheard. Yet, set within the pages of **Sample Motion To Lift Automatic Stay** a charming fictional treasure sporting with organic feelings, lies a fantastic journey waiting to be undertaken. Written by a talented wordsmith, that charming opus attracts viewers on an introspective trip, lightly unraveling the veiled truths and profound influence resonating within ab muscles fabric of each word. Within the psychological depths with this touching review, we will embark upon a honest exploration of the book is primary styles, dissect its charming writing fashion, and succumb to the powerful resonance it evokes serious within the recesses of readers hearts.

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