

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

Daniel F McAuley

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

Sample Motion To Lift Automatic Stay:

Unveiling the Magic of Words: A Overview of "**Sample Motion To Lift Automatic Stay**"

In a world defined by information and interconnectivity, the enchanting power of words has acquired unparalleled significance. Their ability to kindle emotions, provoke contemplation, and ignite transformative change is actually awe-inspiring. Enter the realm of "**Sample Motion To Lift Automatic Stay**," a mesmerizing literary masterpiece penned with a distinguished author, guiding readers on a profound journey to unravel the secrets and potential hidden within every word. In this critique, we shall delve into the book is central themes, examine its distinctive writing style, and assess its profound effect on the souls of its readers.

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