

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

SB Merriam



Sample Motion To Lift Automatic Stay:

This book delves into Sample Motion To Lift Automatic Stay. Sample Motion To Lift Automatic Stay is an essential topic that needs to be grasped by everyone, ranging from students and scholars to the general public. The book will furnish comprehensive and in-depth insights into Sample Motion To Lift Automatic Stay, encompassing both the fundamentals and more intricate discussions.

1. This book is structured into several chapters, namely:
 - Chapter 1: Introduction to Sample Motion To Lift Automatic Stay
 - Chapter 2: Essential Elements of Sample Motion To Lift Automatic Stay
 - Chapter 3: Sample Motion To Lift Automatic Stay in Everyday Life
 - Chapter 4: Sample Motion To Lift Automatic Stay in Specific Contexts
 - Chapter 5: Conclusion
 2. In chapter 1, the author will provide an overview of Sample Motion To Lift Automatic Stay. This chapter will explore what Sample Motion To Lift Automatic Stay is, why Sample Motion To Lift Automatic Stay is vital, and how to effectively learn about Sample Motion To Lift Automatic Stay.
 3. In chapter 2, the author will delve into the foundational concepts of Sample Motion To Lift Automatic Stay. This chapter will elucidate the essential principles that need to be understood to grasp Sample Motion To Lift Automatic Stay in its entirety.
 4. In chapter 3, the author will examine the practical applications of Sample Motion To Lift Automatic Stay in daily life. The third chapter will showcase real-world examples of how Sample Motion To Lift Automatic Stay can be effectively utilized in everyday scenarios.
 5. In chapter 4, this book will scrutinize the relevance of Sample Motion To Lift Automatic Stay in specific contexts. This chapter will explore how Sample Motion To Lift Automatic Stay is applied in specialized fields, such as education, business, and technology.
 6. In chapter 5, the author will draw a conclusion about Sample Motion To Lift Automatic Stay. This chapter will summarize the key points that have been discussed throughout the book.
- The book is crafted in an easy-to-understand language and is complemented by engaging illustrations. This book is highly recommended for anyone seeking to gain a comprehensive understanding of Sample Motion To Lift Automatic Stay.

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