

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

**Roman Wölfel**



**Sample Motion To Lift Automatic Stay:**

## **Sample Motion To Lift Automatic Stay Book Review: Unveiling the Power of Words**

In a global driven by information and connectivity, the energy of words has be evident than ever. They have the capability to inspire, provoke, and ignite change. Such could be the essence of the book **Sample Motion To Lift Automatic Stay**, a literary masterpiece that delves deep into the significance of words and their affect our lives. Published by a renowned author, this captivating work takes readers on a transformative journey, unraveling the secrets and potential behind every word. In this review, we shall explore the book is key themes, examine its writing style, and analyze its overall effect on readers.

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