

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

Xiaolong Qi



Sample Motion To Lift Automatic Stay:

Reviewing **Sample Motion To Lift Automatic Stay**: Unlocking the Spellbinding Force of Linguistics

In a fast-paced world fueled by information and interconnectivity, the spellbinding force of linguistics has acquired newfound prominence. Its capacity to evoke emotions, stimulate contemplation, and stimulate metamorphosis is truly astonishing. Within the pages of "**Sample Motion To Lift Automatic Stay**," an enthralling opus penned by a highly acclaimed wordsmith, readers embark on an immersive expedition to unravel the intricate significance of language and its indelible imprint on our lives. Throughout this assessment, we shall delve into the book's central motifs, appraise its distinctive narrative style, and gauge its overarching influence on the minds of its readers.

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