UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF COLORADO

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		Case No. 15-19049-EEB
DEBORAH IRLANDO)	Chapter 7
)	
ID: xxx-xx-4173)	
JOHN POWERS and GEORGENE	1	
POWERS.		
Movants.	4	
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	1000000)
)	
V.)	
)	
DEBORAH IRLANDO,)	
Respondent,	- 1	
respondent,	4	
A COMPANY PROPERTY OF	4	
M. STEPHEN PETERS,	,	
)	
Trustee.)	

MOTION FOR RELIEF FROM AUTOMATIC STAY

Movants, John and Georgene Powers, by and through counsel, The Law Offices of Michael R. Meaux, LLC, move for relief from the automatic stay pursuant to 11 U.S.C. §362(d) (1) and (2), and as grounds for relief state and allege the following:

 Movants are the owners and lessors of rental property located at 2615 Upham Street, Wheat Ridge, Colorado, 80033 (the "Premises").

The Premises is residential real estate, with a monthly rental amount of \$1,200.00. A copy of the current lease, which has reverted to month-to-month tenancy by its express terms, is attached hereto as "Exhibit 1".

Movants filed their Forcible Entry and Detainer ("FED") action in Jefferson County
Court on July 17, 2015, alleging both monetary and non-monetary breach of the Lease Terms, as
well as Unlawful Detention under Colorado law for Respondent's failure to vacate the Premises
after a valid Notice to Quit terminating her tenancy. The case number for the Jefferson County
FED action is 2015C38537.

Sample Motion To Lift Automatic Stay

Ensheng Dong

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Bond Default Manual Duncan L. Clore, Richard E. Towle, Michael J. Sugar, 2005 CD ROM includes sample forms in PDF Practical Guide to Construction Contract Surety Claims William Schwartzkopf, Richard Tasker, 2005-01-01 Practical Guide to Construction Contract Surety Claims Second Edition provides clear guidance on the methods procedures and case law surrounding the surety process Whether you represent the surety principal or obligee this one of a kind reference will provide you with the indispensable practical guidance and reliable tools you need to manage the surety process Practical Guide to Construction Contract Surety Claims Second Edition is logically organized around the various types of bonds payment bond bid bond performance bond as well as the claims that are asserted against those bonds and the methods of investigation and resolution of those claims It covers in detail the surety's options for resolving performance bond claims including Tender Completion by the obligee Completion by surety Financing the principal This book also addresses matters that affect the claims handling process such as Bankruptcy of the principal Claims for extra contractual damages Claims by the surety against the principal Indemnity for losses sustained by the surety The interrelationship of the surety and the insurance carriers for the construction project Valuable analysis of case law is included within the discussion of each topic and the relevant facts of key cases are highlighted where applicable Bonus Interactive CD ROM Includes All Forms and Documents This unique CD ROM contains nearly 150 forms such as sample agreements and correspondence among the parties providing the guidance you need to act guickly and protect your client's interests in any situation The Landlord's Legal Guide in Texas Traci Truly, 2003 This book is essential for every Texas landlord To be a successful profitable landlord you must be prepared to deal with common problems that may arise during and after each tenancy The Landlord's Legal Guide in Texas discusses how to avoid issues that may strain this relationship including security deposits general maintenance and collecting unpaid rent Written by an accomplished attorney this legal guide will ease the stress and reduce the time needed to perform these duties by explaining the landlord s rights in easy to understand language Awarding Attorneys' Fees and Managing Fee Litigation Alan Hirsch, 1994 The Family Lawyer's Guide to Bankruptcy Shayna M. Steinfeld, Bruce R. Steinfeld, 2008 This book offers practical guidance on the new legislation and how it affects divorcing spouses Among the aspects explained include the types of bankruptcy cases case commencement automatic stay property of the estate lien avoidance priority of alimony maintenance and support debts avoidability of transfers between married spouses executory contracts dismissal closing the case and revocation of discharge Appendices are contained on an accompanying CD ROM *Professional Fees in Bankruptcy* United States. Congress. Senate. Committee on the Judiciary. Subcommittee on Courts and Administrative Practice, 1993 Commodity and Securities Exchanges ,2010 Special edition of the Federal register containing a codification of documents of general applicability and future effect as of April 1 with ancillaries **Code of Federal Regulations** ,2004 Code of Federal Regulations, Title 17, Commodity and

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