

Bruce K. Medeiros
DAVIDSON ♦ MEDEIROS
1280 Bank of America Center
601 West Riverside Avenue
Spokane, Washington 99201
(509) 624-4600

SERVED ON OFFICE OF
U.S. Trustee August 30, 2004
DAVIDSON ♦ MEDEIROS

1 Attorney for Global Credit Union
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF IDAHO

REC'D FILED
CAMERON S. BURKE,
CLERK, IDAHO
2004 AUG 31 P 12:23
U.S. DISTRICT

12 In re . . .

13 **MICHAEL R. DENNEY and TRACY**
14 **ANN DENNEY,**
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19 Debtors.

Case No. **04-21097**
Chapter **7**

**NOTICE OF MOTION FOR RELIEF
FROM THE AUTOMATIC STAY AND
ABANDONMENT, AND REQUESTING
THE ORDER BE EFFECTIVE UPON
ENTRY PURSUANT TO BR 4001**

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21 Notice is hereby given that Global Credit Union ("Global"), a secured creditor
22 herein, has filed a Motion for Relief from the Automatic Stay and Abandonment.
23 Global is also requesting that the Order granting the relief requested be effective
24 upon entry of the Order pursuant to BR 4001, with respect to a 1998 Dodge
25 Durango, VIN 1B4HS28Y7WF128855
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29 **NOTICE**

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31 Any party in interest opposing the Motion must file and serve an objection
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DAVIDSON ♦ MEDEIROS
ATTORNEYS AT LAW
A PROFESSIONAL SERVICE CORPORATION

1280 BANK OF AMERICA CENTER
601 WEST RIVERSIDE AVENUE
SPOKANE, WASHINGTON 99201
FACSIMILE: (509) 623-1660
(509) 624-4600

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Notice Of Motion For Relief From The Automatic Stay
And Requesting The Order Be Effective Upon Entry Pursuant To BR 4001
Plendings\BKM.cn

1 thereto not later than twenty (20) days after the date of mailing of this Motion. The
2 objection shall specify identify those matters contained in the Motion that are at
3 issue and any other basis for opposition to the Motion. Absent the filing of a timely
4 objection, the Court may grant the relief being sought without a hearing. If an
5 objection is filed, the objection shall be served upon the moving party and upon all
6 parties receiving service of the Motion.
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10 Any party opposing this Motion shall contact the Court's calendar clerk to
11 schedule a preliminary hearing. At the time of filing the Objections to the Motion,
12 the objecting party shall file and serve a notice of such hearing.
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15 You are further notified, notwithstanding the above, that stay of actions
16 against the above-referenced property will terminate by operation of law thirty-
17 three (33) days after the date of mailing of this Motion pursuant to 11 U.S.C. §362
18 and BR 9006(f). In such case, the stay can only be extended if the Court, after
19 notice and hearing, which may have to be requested by you, is held before the
20 expiration of said thirty-three (33) days and the stay is ordered extended by the
21 Court.
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27 You are further notified in the event no hearing is held within the thirty-
28 three (33) days after the date of mailing of this Motion, the moving party may
29 additionally request an Order from the Court declaring the stay actions against the
30 above-referenced property as having been terminated or annulled.
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DATED this 31 day of August 2004.

DAVIDSON ♦ MEDEIROS



Bruce K. Medeiros, WSBA No. 16380
Attorney for Global Credit Union
1280 Bank of America Center
601 West Riverside Avenue
Spokane, WA 99201