

1 TIFFANY & BOSCO, P.A  
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 9 **Attorney for Secured Creditor**  
 10 Bank of America, N.A.  
 11 17-70845

7 **UNITED STATES BANKRUPTCY COURT**  
 8 **DISTRICT OF NEVADA**  
 9 **LAS VEGAS**

<p>10 In re:</p> <p>11</p> <p>12</p> <p>13 Robert C. Graham, LTD. fdba Rob Graham &amp; Associates fdba Lawyers West,</p> <p>14</p> <p>15</p> <p>16 Debtor</p>	<p><b>Bk Case No.: 16-16655-btb</b></p> <p>Chapter 7</p> <p>NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY HEARING DATE: May 9, 2017 HEARING TIME: 10:00 a.m.</p> <p>ESTIMATED TIME: 5 Minutes</p>
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17 TO THE HONORABLE JUDGE BRUCE T. BEESLEY, THE DEBTOR, DEBTOR'S ATTORNEY  
 18 OF RECORD AND THE CHAPTER 7 TRUSTEE, AND OTHER INTERESTED PARTIES:

19 **NOTICE IS HEREBY GIVEN** that a MOTION FOR RELIEF FROM AUTOMATIC STAY  
 20 was filed on March 30, 2017 by Gregory L. Wilde, Attorney for Secured Creditor,  
 21 Bank of America, N.A.. The Motion seeks the following relief: for an order terminating the automatic  
 22 stay, to allow Movant to proceed with its non-bankruptcy remedies, including, but not limited to  
 23 obtaining possession of and selling the personal property, 2014 BMW 750 XI, VIN  
 24 WBAYB6C50ED224759 (the "personal property").  
 25  
 26

1 Any opposition must be filed pursuant to Local Rule 9014(d)(1).

2 NOTICE IS FURTHER GIVEN that if you do not want the court to grant the relief sought in  
3 the Motion, or if you want the court to consider your views on the Motion, then you must file an  
4 opposition with the court, and serve a copy on the person making the Motion no later than 14 days  
5 preceding the hearing date for the motion, unless an exception applies (see Local Rule 9014(d)(3)). The  
6 opposition must state your position, set forth all relevant facts and legal authority, and be supported by  
7 affidavits or declarations that conform to Local Rule 9014( c).  
8

9 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading with the court.  
10 You *must* also serve your written response on the person who sent you this notice.

11 If you do not file a written response with the court, or if you do not serve your written response on the  
12 person who sent you this notice, then:

13  The court may *refuse to allow you to speak* at the scheduled hearing; and

14  The court may *rule against you* without formally calling the matter at the hearing

15 NOTICE IS FURTHER GIVEN that the hearing on the said Motion will be held before a  
16 United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Boulevard South,  
17 Second Floor, Courtroom No. 4, Las Vegas, Nevada 89101 on May 9, 2017, at the hour of  
18 10:00 a.m..

19 DATED this 30th day of March, 2017.

20  
21 **TIFFANY & BOSCO, P.A.**

22 By: /s/Gregory L. Wilde, Esq  
23 GREGORY L. WILDE, ESQ.  
24 Attorney for Movant  
25 212 South Jones Boulevard  
26 Las Vegas, Nevada 89107

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9 Bank of America, N.A.  
10 17-70845

11 **UNITED STATES BANKRUPTCY COURT**  
12 **DISTRICT OF NEVADA**  
13 **LAS VEGAS**

<p>14 In Re:</p> <p>15 Robert C. Graham, LTD. fdba Rob Graham &amp; 16 Associates fdba Lawyers West,</p> <p>17 Debtor</p>	<p>18 Bk Case No.: 16-16655-btb</p> <p>19 Date: <u>May 9, 2017</u></p> <p>20 Time: <u>10:00 a.m.</u></p> <p>21 Chapter 7</p>
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22 **CERTIFICATE OF SERVICE OF NOTICE AND**  
23 **MOTION FOR RELIEF FROM AUTOMATIC STAY**

24 1. On March 20, 2017 I served the following document(s):

25 NOTICE OF MOTION AND MOTION FOR RELIEF FROM AUTOMATIC STAY

26 2. I caused to be served the above-named document(s) by the following means to the persons as listed below:

**X a. ECF System**

Samuel A. Schwartz  
sam@nvfirm.com  
Attorney for Debtor

Victoria L. Nelson  
trustee@nelsonhoumand.com  
Trustee

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**X b. United States mail, postage fully prepaid:**

Samuel A. Schwartz, Esq.  
6623 Las Vegas Blvd. South, Suite # 300  
Las Vegas, NV 89119  
Attorney for Debtor

Robert C. Graham, LTD. fdba Rob Graham & Associates  
fdba Lawyers West  
10000 W. Charleston Blvd., Ste 140  
Las Vegas, NV 89135  
Debtor

U.S. Trustee  
300 Las Vegas Boulevard South, Suite #4300  
Las Vegas, NV 89101

**I declare under penalty of perjury that the foregoing is true and correct.**

DATED this 30th day of March, 2017..

By: /s/Laurali Cano