

1 Herbert B. Raymond, Esq.
Attorneys at Law
2 7 Glenwood Avenue, 4TH Floor
East Orange, New Jersey 07017
3 (973) 675-5622; (408) 519-6711 Telefax
Email: bankruptcy123@comcast.net
4 Herbert B. Raymond #HR-1379; Jeffrey M. Raymond, Kevin DeLyon
Attorneys for the Debtor(s)

5 -----
6 IN RE:

7 IFRAN SHAH,
8 2708 Plaza Drive
9 Woodbrige, NJ 07095
10 xxx-xx-2001 (Ifran Shah)

11 DEBTOR(S).

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
CHAPTER 13
CASE NO.: 06-20937 (MBK)

ORAL ARGUMENT WAIVED

12 NOTICE OF MOTION TO REOPEN CASE
13 PURSUANT TO CODE SECTION 350(b)

14 TO:

15 Albert Russo, Esq.
16 1 AAA Drive, Suite 101
Robbinsville, NJ 08691
17 Chapter 13 Trustee

18 Ifran Shah, debtor(s) in the above-entitled action have
19 filed an Motion with the Court to reopen this case.

20 **You rights may be affected. You should read these papers**
21 **carefully and discuss them with your attorney. If you have one**
22 **in this bankruptcy case. (If you do not have an attorney, you**
23 **may wish to consult one.)**

24 If you do not want the court to reopen this case, or if you
25 want the court to consider your views on the motion, then on or
26 before at least seven days before the motion hearing date of **MAY**
27 **13, 2014 AT 9:00 A.M.**, you or your attorney must:

28 File with the court a written response, an answer,

1 explaining your position at:

2 Clerk
3 United States Bankruptcy Court
4 District of New Jersey
5 402 E. State Street
6 Trenton, NJ 08608

7 If you mail your response to the court for filing, you must
8 mail it early enough so the court will **receive** it on or before
9 the date stated above.

10 You must also mail a copy to:

11 Herbert B. Raymond, Esq.
12 7 Glenwood Avenue, 1st Floor
13 East Orange, New Jersey 07017
14 Attorney for the Debtor(s)

15 Albert Russo, Esq.
16 1 AAA Drive, Suite 101
17 Robbinsville, NJ 08691
18 Chapter 13 Trustee

19 Attend the hearing scheduled to be held on
20 **MAY 13, 2014 at 9:00 A.M.** in the Clarkson S. Fisher United States
21 Courthouse, 402 E. State St., Courtroom #8, Trenton, New Jersey
22 08608 before the Honorable Michael B. Kaplan, U.S.B.J.

23 **TAKE FURTHER NOTICE** that reliance will be made upon the
24 attached Certification.

25 **TAKE FURTHER NOTICE** that answering papers and briefs, if
26 necessary, or a statement that no answering brief is necessary
27 and the basis thereof, shall be filed seven (7) days before the
28 date noticed for argument. This Motion shall be deemed
uncontested unless responsive papers are filed within seven (7)
days from the date of this Motion and state with particularity
the basis for the opposition.

1 STATEMENT AS TO WHY NO BRIEF IS NECESSARY IN ACCORDANCE WITH
2 D.N.J. LBR 9013-2

3 This motion requests an Order Reopening this case to Address
4 an Asset.

5 The facts relied on by the Debtor/Petitioner that are set
6 forth in the Debtor's Certification filed in support of the
7 Motion do not present complicated questions of fact or unique
8 questions of law. Therefore, no brief is necessary for the
9 Court's consideration of this Motion.

10 If you or your attorney do not take these steps, the court
11 may decide that you do not oppose the relief in the motion and
12 may enter an order granting the relief requested by the debtor.

13 Dated: April 19, 2014

14 /S/ HERBERT B. RAYMOND

15 -----
16 HERBERT B. RAYMOND, ESQ.
17 Attorney for the Debtor(s)
18
19
20
21
22
23
24
25
26
27
28