

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

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In re:

Lee Waddell a/k/a Lee Charles Waddell,

Debtor.

Hearing Date: April 24, 2013

Hearing Time: 9:15 a.m.

Location: Albany, NY

Case No. 12-12411 (Chapter 7)

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Adam Conway,

Plaintiff,

Adversary No.: 12-90088-1

v.

Lee Waddell a/k/a Lee Charles Waddell,

Defendant.

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**NOTICE OF PLAINTIFF ADAM CONWAY'S MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56, as made applicable by Federal Bankruptcy Rule of Procedure 7056, and Local Bankruptcy Rule 7056, Plaintiff Adam Conway hereby moves this Honorable Court for an Order at 9:15 a.m. on April 24, 2013, granting summary judgment against the Defendant Lee Waddell a/k/a Lee Charles Waddell on his First Claim for Relief set forth in the Complaint of Adam Conway, to determine Dischargeability of Debtor pursuant to 11 USC 523. The factual and legal grounds for this Motion are set forth in the accompanying Statement of Uncontested Facts In Support of Plaintiff Adam Conway's Motion for Summary Judgment and Memorandum of Law in Support of Plaintiff Adam Conway's Motion for Summary Judgment, which supporting documents are being filed contemporaneously herewith and incorporated by reference herein as if set forth in full.

PLEASE TAKE NOTE, pursuant to Bankruptcy Rule 9014 and Local Bankruptcy Rule 9013-1, if you intend to oppose either or both motions, you must serve on the movant's counsel and file with the clerk of the bankruptcy court, written opposition to the motion not later than seven (7) days prior to the return date of this motion. In the event no written opposition is served and filed, no hearing on the motion will be held before the court and the court will consider the motion as unopposed.

DATED: March 29, 2013  
Albany, NY

Yours, etc.

GANZ WOLKENBRETT & SIEGFELD LLP

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