

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN

In re:

CASE NO. 14-31425-GMH  
(Chapter 7)

WILLIAM J. FOLEY

Debtor

**MOTION IN SUPPORT OF DEBTOR'S MOTION FOR IMPOSITION OF  
AUTOMATIC STAY**

NOW COMES, Douglas F. Mann, Chapter 7 Trustee of the above-captioned case, and supports the Debtor's motion for imposition of automatic stay as follows:

1. The undersigned is the duly appointed, qualified and acting Chapter 7 Trustee in this case.
2. The Debtor filed Chapter 13 bankruptcy on September 10, 2014.
3. The case was converted to Chapter 7 on November 25, 2014.
4. Trustee believes there are assets to be collected and administered in this case as indicated in the Debtor's bankruptcy schedules.

Dated this 22<sup>nd</sup> of January, 2015



DOUGLAS F. MANN  
Chapter 7 Trustee

Douglas F. Mann, Chapter 7 Trustee  
740 N. Plankinton Ave., #210  
Milwaukee, WI 53203  
(414) 276-5355 (telephone)  
(414) 276-5350 (facsimile)

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**CERTIFICATE OF SERVICE BY MAIL**

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I, BETH BERTRAM, of the law offices of Douglas F. Mann, Attorney at Law, 740 North Plankinton Avenue, Suite 210, Milwaukee, Wisconsin, 53203-2403, certify:

That I am, and at all times hereinafter mentioned was, more than 18 years of age;

That on the 22<sup>nd</sup> day of January, 2015 I served a copy of the within *Motion* on the following parties:

U. S. Trustee  
**Via electronic service**

Mr. William J. Foley  
11400 West Bluemound Road, Suite 300  
Brookfield, Wisconsin 53226

**Via First Class Mail**

Ms. Joan M. Shepard  
Nistler & Condon, SC  
7000 West North Avenue  
Wauwatosa, Wisconsin 53213

**Via First Class Mail**

Mr. Marc Rassbach  
PO Box 39  
Milwaukee, Wisconsin 53201-0039

EXECUTED ON: January 22, 2015

  
BETH BERTRAM