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Attorneys for Movant

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

In re	)	Case No. XX-XXXXX
	)	
	)	Chapter 7
Debtor(s),	)	
	)	RS No.: DHC-1716
	)	
Movant,	)	Date: 4/29/2004
	)	Time: 4:00 pm
	)	Judge: Hon. Place: 1300
	)	Clay Street
	)	Room 220
	)	Oakland, CA 94612
Respondents.	)	
	)	

**MOTION FOR RELIEF FROM AUTOMATIC STAY**

(hereinafter “Movant”) hereby moves this Court for relief from the automatic stay pursuant to 11 U.S.C. § 362(d)(1) for cause on the grounds that Debtor has defaulted on the obligations secured by the Vehicle and Movant’s interest in the Vehicle is not adequately protected. Movant also seeks relief pursuant to 11 U.S.C. §362(d)(2) on the grounds that there is no equity in the Vehicle for the Debtor or the estate and it is not necessary for the Debtor’s effective reorganization.

This motion is brought pursuant to Local Bankruptcy Rule 4001-1 of the Local Rules of Practice for the United States Bankruptcy Court, Northern District of California and is supported by the concurrently filed notice and declaration, as well as all other papers and pleadings on file in the Debtor’s bankruptcy case, and such other evidence as may be filed prior to, or presented at,