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*Attorneys for Petitioners*  
*Jian Wang and Yung Fen*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
In Re GMAC Mortgage, LLC Chapter 11  
  
Debtor.  
----- Case No.: 12-12020 (MG)  
JIAN WANG and YUNG FEN  
1225 RESERVOIR ROAD Assigned to: Hon. Martin Glenn  
CHESHIRE, CONNECTICUT 06410  
  
Plaintiffs, Returnable:  
11:00 a.m., October 17, 2017  
  
vs.  
  
GMAC MORTGAGE, LLC,  
  
Defendant.

-----X

**NOTICE OF MOTION FOR ORDER FOR RELIEF FROM  
AUTOMATIC BANKRUPTCY STAY**

**PLEASE TAKE NOTICE** that upon the annexed Affirmation of Mark D. Shifton, Esq., dated August 11, 2017, and the Exhibits attached thereto, Petitioners Jian Wang and Yung Fen will move this Court, before the Honorable Martin Glenn, United States Bankruptcy Judge, Southern District of New York, at the United States Courthouse, Daniel Patrick Moynihan U.S. Courthouse, 500 Pearl Street, New York, New York 10007, at 11:00 a.m. on October 17, 2017,



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pursuant to Local Bankruptcy Rule 4001-1, granting Petitioners relief from the automatic  
bankruptcy stay under 11 U.S. Code § 362.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Local Bankruptcy Rule 4001-1,  
this motion is being filed not more than thirty days from the return date

**PLEASE TAKE FURTHER NOTICE** that pursuant to Local Bankruptcy Rule 9006-1,  
all answering papers to this Petition must be served so as to ensure actual receipt not later than  
seven days before the return date.

Dated: Princeton, New Jersey  
September 22, 2017

**SEIGER GFELLER LAURIE LLP**



By: \_\_\_\_\_  
Mark D. Shifton, Esq. (MS8233)

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