

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

In re) Case No. 07-43128-JBR
Gailon Arthur Joy,) Chapter 7
Debtor)

TRUSTEE'S MOTION TO SHORTEN DEADLINE TO SUBMIT OBJECTIONS TO
PROPOSED SALE AND HIGHER OFFERS

Janice G. Marsh, the trustee, requests the court to shorten the time, to a total of ten (10) days, in which creditors and other interested parties may submit objections to the motion to sell property filed simultaneously herewith and to submit higher offers.

1. On August 14, 2007, the debtor, Gailon Arthur Joy, commenced this case; immediately thereafter, Janice G. Marsh was appointed as trustee.
2. Simultaneously herewith, the trustee is filed a motion to sell the following property:
 - (1) all domain names owned by the debtor and (2) all prepetition claims the bankruptcy estate may have against (a) Three Angels Broadcasting Network, Inc., and (b) its officers, directors, shareholders and employees, including Danny Shelton (collectively "Buyers"), including a release of any claims the estate has or might have against the Buyers (collectively "Property")
3. The Buyers have offered to purchase the Property for the amount of \$5,000.00 within 30 days from the date of a final, nonappealable order allowing this motion.
4. The trustee has tentatively accepted the offer from the Buyers.
5. The trustee seeks to shorten the time, to a total of ten (10) days, in which to submit objections to the motion to sell and higher offers.
6. The trustee is requesting also that the order authorizing the sale NOT be stayed.
7. The trustee believes that the shortened deadline is warranted because the debtor allegedly has been infringing trademark rights and defaming and interfering with the business of the Buyers, as more particularly described in the Buyers' motion for relief from the automatic stay [#16], allowed [#28].

WHEREFORE, Janice G. Marsh, the trustee, requests the court

1. to enter an order shortening the time in which creditors and other interested parties may submit objections to the motion to sell and higher offers and
2. to grant such further and other relief as is just.

Respectfully Submitted,

/s/ Janice G. Marsh
Janice G. Marsh, Trustee
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CERTIFICATE OF SERVICE

Janice G. Marsh certifies that, on this date, she served this document by mail, unless otherwise indicated or unless notice is received electronically, to the recipients listed on the attachment, but not the attachment itself.

Dated: November 30, 2007

/s/ Janice G. Marsh
Janice G. Marsh

SERVICE LIST
Case No. 07-43128-JBR

Gailon Arthur Joy dba Nemco PO Box 1425 Sterling, MA 01564	Laird J. Heal 3 Clinton Road PO Box 365 Sterling, MA 01564 Debtor's Attorney	Richard T. King Assistant United States Trustee 446 Main Street, 14 th Floor Worcester, MA 01608
Three Angels Broadcasting Network, Inc. c/o Joseph B. Collins 101 State Street Springfield, MA 01103	Recovery Management Systems Corp. 25 S.E. Avenue, Suite 1120 Miami, FL 33131	Charter PO Box 78016 Phoenix, AZ 85062
First Premiere Bank 601 South Minnesota Ave. Sioux Falls, SD 57104	Fratlicelli Oil Co. 239 Litchfield Ave. Leominster, MA 01453	HSBC 120 Corporate Blvd. Suite 1 Norfolk, VA 23502
Leominster Plumbing & Heating Co., Inc. PO Box 01453 Leominster, MA 01453	Lustig, Glaser & Wilson, PC PO Box 9127 Needham, MA 02492	Massachusetts Department of Revenue Bankruptcy Unit PO Box 9564 Boston, MA 02114-9564
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