## FILED 2004 DEC 13 A 10:35

## IN THE UNITED STATES BANKRUPTCY COURT CLERK FOR THE WESTERN DISTRICT OF PENNSYLVANUS. BANKRUPTCY COURT - PGH drb

Debtors.  ANTHONY CRANE RENTAL, L.P. d/b/a MAXIM CRANE WORKS,  Debtors.  )  (Jointly Administered) )  Debtors. ) )	
)	
RICHARD SOLANO, AN INDIVIDUAL, ) Related Docket No.: 775  Movant, )	
v.  Hearing Date and Time:  December 14, 2004 3:00 P.M  ANTHONY CRANE RENTAL, L.P. d/b/a  MAXIM CRANE WORKS, DEBTOR-IN- POSSESSION,  Objection Deadline:  Respondent.	M.

PRAECIPE TO WITHDRAW MOTION OF RICHARD SOLANO FOR RELIEF FROM AUTOMATIC STAY TO PURSUE RETALIATORY DISCHARGE/UNLAWFUL TERMINATION CAUSE OF ACTION

#### TO THE CLERK OF COURT:

Kindly withdraw the Motion of Richard Solano for Relief from the Automatic Stay to Pursue Retaliatory Discharge/Unlawful Termination Cause of Action filed on November 15, 2004.

## Respectfully submitted,

December 10, 2004

Todd S. McGarvey **BOCHETTO & LENTZ, P.C.** 

1524 Locust Street Philadelphia, PA 19102 215-735-3900

Fax: 215-735-2455

PA 89624

## IN THE UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF PENNSYLVANIA

In Re:	)
ACR MANAGEMENT, L.L.C., et. al,	) ) Bankruptcy Case No. 04-27848-MBM
Debtors.	) Chapter 11
ANTHONY CRANE RENTAL, L.P. d/b/a MAXIM CRANE WORKS,	) (Jointly Administered)
Debtors.	) ) )
RICHARD SOLANO, AN INDIVIDUAL	Chapter 11 (Jointly Administered with ACR Management, L.L.C., at No. 04-27848- MBM)
Movant,	)
v.	) Docket No.
ANTHONY CRANE RENTAL, L.P. d/b/a MAXIM CRANE WORKS, DEBTOR-IN-POSSESSION,	) ) ) )
Respondent.	<i>,</i> )

# CERTIFICATE OF SERVICE PRAECIPE TO WITHDRAW MOTION OF RICHARD SOLANO FOR PARTIAL RELIEF FROM AUTOMATIC STAY TO PURSUE CAUSE OF ACTION AGAINST THE DEBTOR FOR RETALIATORY DISCHARGE/UNLAWFUL TERMINATION

I, Todd S. McGarvey, Esquire, certify under penalty of perjury that I caused to be served the above captioned pleading, *Praecipe to Withdraw Motion of Richard Solano for Partial Relief From Automatic Stay to Pursue Cause of Action Against the Debtor for Retaliatory Discharge/Unlawful Termination* on the parties at the addresses on the attached matrix, on December 10, 2004 via U.S. Mail, postage prepaid. The total number of parties served was 1.

### EXECUTED ON:

By:	
27.	Signature
	Todd S. McGarvey, Esquire
	Typed Name
	BOCHETTO & LENTZ, P.C
	1524 Locust Street,
	Philadelphia, PA 19102
	(215)735-3900
	89624 PA
	List Bar I.D. and State of Admission

## IN THE UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF PENNSYLVANIA

In Re:	)
ACR MANAGEMENT, L.L.C., et. al,	) ) Bankruptcy Case No. 04-27848- MBM
Debtors.	)
ANTHONY CRANE RENTAL, L.P. d/b/a	) Chapter 11
MAXIM CRANE WORKS,	) (Jointly Administered)
Debtors.	)
RICHARD SOLANO, AN INDIVIDUAL	Chapter 11 (Jointly Administered with ACR Management, L.L.C., at No. 04- 27848- MBM)
Movant,	) (VIDIVI)
V.	) Docket No.
ANTHONY CRANE RENTAL, L.P. d/b/a MAXIM CRANE WORKS, DEBTOR-IN-POSSESSION,	) ) )
Respondent.	)

#### **MAILING MATRIX**

Douglas A. Campbell, Esquire David B. Salzman, Esquire Salene R. Mazur, Esquire Campbell & Levine, LLC 330 Grant Street Grant Building, Suite 1700 Pittsburgh, PA 15219 Via U.S. Mail