UNITED STATES BANKRUPTCY COURT **DISTRICT OF NEW JERSEY**	
Caption in Compliance with D.N.J. LBR 9004-2(c) **WASSERMAN, JURISTA & STOLZ, P.C.** 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Phone: (973) 467-2700 Fax: (973) 467-8126 Counsel to Debtor-in-Possession **DANIEL M. STOLZ, ESQ.** **LEONARD C. WALCZYK, ESQ.**	
In Re: **ALTOMARE AUTO GROUP, LLC, d/b/a UNION VOLKSWAGEN,** Debtor.	Chapter 11 Case No. 16-22376 JKS Honorable John K. Sherwood
In Re: **ALTOMARE 22 UNION, LLC,** Debtor.	Chapter 11 Case No. 16-22628

NOTICE OF MOTION FOR ORDER (I) DIRECTING JOINT ADMINISTRATION OF THE CHAPTER 11 CASES PURSUANT TO BANKRUPTCY CODE SECTION 302 AND BANKRUPTCY RULE 1015(b) AND (II) WAIVING REQUIREMENTS OF BANKRUPTCY CODE SECTION 342(c)(1) AND BANKRUPTCY RULES 1005 AND 2002(n)

TO: Office of the U.S. Trustee
One Newark Center, Suite 2100
Newark, NJ 07102

Internal Revenue Service
District Director's Office
Newark District Office
955 S. Springfield Avenue
Springfield, New Jersey 07081

Internal Revenue Service
District Director
One Newark Center
Newark, New Jersey 07102

State of New Jersey
Division of Taxation
50 Barrack Street
P. O. Box 269
Trenton, New Jersey 08695

INCLUDING: 20 LARGEST UNSECURED CREDITORS and ALL PARTIES LISTED ON ATTACHED SERVICE LIST

PLEASE TAKE NOTICE, that on the date specified on the *Order (I) Directing Joint Administration of the Chapter 11 Cases Pursuant to Bankruptcy Code Section 302 and Bankruptcy Rule 1015(b) and (II) Waiving Requirements of Bankruptcy Code Section 342(c)(1) and Bankruptcy Rules 1005 and 2002(n)* the undersigned, as proposed counsel for Debtor, shall move before the United States Bankruptcy Judge John K. Sherwood, United States Bankruptcy Court, King Federal Building, 50 Walnut Street, 3rd Floor, P.O. Box 3152, Newark, New Jersey 07102, seeking the entry of an Order authorizing the Debtor to use cash collateral, and for such other relief that is just and proper.

PLEASE TAKE FURTHER NOTICE, that the undersigned shall rely upon the Motion filed herewith in support of the relief sought.

PLEASE TAKE FURTHER NOTICE, that oral argument is not requested.

PLEASE TAKE FURTHER NOTICE, that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the Motion.

PLEASE TAKE FURTHER NOTICE, that all objections must be in writing, filed with the Clerk of the United States Bankruptcy Court, King Federal Building, 50 Walnut Street, 3rd Floor, P.O. Box 1352, Newark, New Jersey 07102, and a copy thereof must simultaneously be

served upon Wasserman, Jurista & Stolz, P.C., Attn: Leonard C. Walczyk, Esq., 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920.

PLEASE TAKE FURTHER NOTICE, that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Respectfully submitted,

WASSERMAN, JURISTA & STOLZ, P.C.
Counsel for Debtor and Debtor-in-Possession,
Altomare Auto Group, LLC, d/b/a Union Volkswagen

By: *__/s/ Leonard C. Walczyk_____.*
Date: June 30, 2016 **LEONARD C. WALCZYK**

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