

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
MIDDLE DISTRICT OF FLORIDA

TAYLOR, BEAN & WHITAKER)	Bk. No. 3:09-bk-07047-JAF
MORTGAGE CORP.,)	
)	
Debtor.)	Chapter 11
)	
)	Judge Jerry A. Funk

**UNITED STATES' MOTION TO LIFT AUTOMATIC STAY TO ADD TAYLOR, BEAN
& WHITAKER MORTGAGE CORP. AS A PARTY TO THE FEDERAL TAX LIEN
ENFORCEMENT ACTION, *UNITED STATES OF AMERICA v. ANGELA S. FORD, et al.*,
PENDING IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MICHIGAN, AND TO ALLOW
THAT ACTION TO CONTINUE**

Now comes the United States of America and moves this Court for relief from the automatic stay pursuant to 11 U.S.C. § 362(d), Federal Rule of Bankruptcy Procedure 4001, and Local Rule 2002-4. Specifically, the United States moves the Court for an entry of the proposed order (attached) lifting the automatic stay to add Taylor, Bean & Whitaker Mortgage Corp. ("TBW") as a party in the federal tax lien enforcement action in *United States of America v. Ford, et al.*, No. 2:10-cv-12642-MOB-MAR, pending in the United States District Court for the Eastern District of Michigan, and allow that action to proceed as against TBW. The following documents are attached: (1) proposed order; (2) notice and opportunity to object; (3) brief in

support; and (4) copy of mortgage granted by Angela S. Ford.

Respectfully submitted,

JOHN A. DiCICCO
Acting Assistant Attorney General
Tax Division, U.S. Department of Justice

/s/ Patrick B. Gushue
PATRICK B. GUSHUE
Trial Attorney, Tax Division
U.S. Department of Justice
Post Office Box 55
Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 307-6010
Facsimile: (202) 514-5238
Email: Patrick.B.Gushue@usdoj.gov

Local Counsel:
Robert O'Neill,
United States Attorney