

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

IN RE:

**CASE NUMBER: 3:09-bk-07047-JAF
CHAPTER 11**

Taylor Bean & Whitaker Mortgage Corp.

Debtor.

_____ /

MOTION FOR RELIEF FROM AUTOMATIC STAY

[Regarding Real Property Located at: 70 Thistle Road, North Andover, Massachusetts 01845]

TO THE HONORABLE JUDGE OF SAID COURT:

Secured Creditor, DLJ Mortgage Capital, Inc. (“Secured Creditor”), by and through the undersigned counsel, hereby moves this Court pursuant to 11 U.S.C. § 362(d) of the Bankruptcy Code, for a modification of the automatic stay provisions for cause, and, in support thereof, states the following:

1. Jurisdiction of this cause is granted to the Bankruptcy Court pursuant to 28 U.S.C. § 1334, 11 U.S.C. § 362(d), and all other applicable rules and statutes affecting the jurisdiction of the Bankruptcy Courts generally.
2. Debtor, Taylor Bean & Whitaker Mortgage Corp. (“Debtor”), filed a voluntary petition pursuant to Chapter 11 of the United States Bankruptcy Code on 8/24/2009.
3. The Debtor is or was the holder of a second mortgage or junior lien on a parcel of real property that is the subject of the instant Motion. In other instances, the Debtor is or was the mortgage servicer on a mortgage loan.

4. On 11/18/2005, Secured Creditor's customer, Juanita C. Singh (the "Customer"), who is not a Debtor in this bankruptcy case, executed and delivered a Promissory Note ("Note") and a Mortgage ("Mortgage") securing payment of the Note, in the amount of \$920,000.00 to Mortgage Electronic Registration Systems, Inc. as nominee for Taylor, Bean & Whitaker Mortgage Corp. The Mortgage was recorded on 11/23/2005 in Book 9902 at Page 123 of the Public Records of Essex County, Massachusetts. The loan was assigned to Secured Creditor. Copies of the Note and Allonge, Mortgage, and Assignment of Mortgage are attached hereto as Exhibits "A," "B," and "C."

5. The Mortgage provides Secured Creditor a lien on the real property located in Essex County and legally described as follows:

THE LAND ON THE WESTERLY SIDE OF THISTLE ROAD IN NORTH ANDOVER IN THE COUNTY OF ESSEX AND SAID COMMONWEALTH OF MASSACHUSETTS AND BEING SHOWN AS LOT 40D ON A PLAN ENTITLED "PLAN OF LAND IN NORTH ANDOVER BY HAYES ENGINEERING DATED JULY 23, 2003, SCALE 1"=40'; HAYES ENGINEERING, INC." AND RECORDED WITH THE ESSEX NORTH DISTRICT REGISTRY OF DEEDS AS PLAN NO. 14615. SAID LOT 40D CONTAINS 78,822 SQUARE FEET, MORE OR LESS, ACCORDING TO SAID PLAN.

This property is located at the street address of: 70 Thistle Road, North Andover, MA 01845.

6. The payments due pursuant to the aforementioned Note and Mortgage have been in default, and remain in default, since 11/01/2010. The Customer is indebted to the Secured Creditor in the principal amount of \$920,000.00, together with accrued interest from 10/01/2010, pre-petition late charges, plus other fees and costs advanced pursuant to the note and mortgage. *See* Secured Creditor's Affidavit in Support of the Motion for Relief from Stay which is attached hereto and incorporated herein as Exhibit "D."

7. Secured Creditor's security interest in the subject property is significantly jeopardized by the Customer's failure to make regular monthly payments under the subject loan documents, while Secured Creditor is prohibited from pursuing lawful remedies to protect such interest.

8. Furthermore, the Debtor and the bankruptcy estate have made no offer of adequate protection to Secured Creditor regarding Secured Creditor's interest in the subject property. Thus, Secured Creditor is not being adequately protected.

9. According to Zillow.com, the market value of the subject property is \$636,600.00. Thus, there is no equity in the property for the benefit of the Debtor or the bankruptcy estate. A copy of the Valuation Report is attached hereto and made apart hereof as Exhibit "E."

10. If Secured Creditor is not permitted to enforce its security interest in the collateral or be provided with adequate protection, it will suffer irreparable injury, loss and damage.

11. Secured Creditor respectfully requests the Court grant it relief from the Automatic Stay pursuant to §362(d)(1) for cause, as the value of the collateral is insufficient to adequately protect Secured Creditor; and pursuant to §362(d)(2), as there is no equity in the property and the property is not necessary to an effective reorganization.

12. Moreover, Secured Creditor asserts that there is sufficient cause to justify the waiver of the 14-day stay period imposed by Fed.R.Bankr.P. 4001(a)(3). Secured Creditor, therefore, respectfully requests that the Court waive the requirement of Rule 4001(a)(3).

WHEREFORE, Secured Creditor, prays this Honorable Court enter an order modifying the automatic stay under 11 U.S.C. § 362(d) to permit Secured Creditor to take any and all steps necessary to exercise any and all rights it may have in the collateral described herein, to gain possession of said collateral, and to have such further relief as this Honorable Court deems just and appropriate.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Relief and the attached exhibits have been filed with the Clerk of Court using the CM/ECF system on this 30 day of August, 2011. I also certify that the foregoing was served on this day by either United States Mail or Electronic Mail through the CM/ECF system to the parties listed below:

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Novi, MI 48377-1634

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Michael & Margaret Jaap
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Vicki Boldrick
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 Eminence, KY 40019-1144

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 103 Southerwood Pl.
 Savannah, GA 31405-8104

William R. Baldiga
 Brown Rudnick LLP
 One Financial Center
 Boston, MA 02111-2600

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

IRS
 Small Business/Self Employed
 400 W Bay Street, Ste 240
 Jacksonville, FL 32202

Cintas Document Management
 P.O. Box 633842
 Cincinnati, OH 45263

Dell Financial Services, L.P.
 12234 N. Ih-35 Bldg. B.
 Austin, TX 78753

Department of Revenue Services
 Taxpayer Services Division
 25 Sigourney Street Ste 2
 Hartford, CT 06106-5032

Guaranty Bank
 4000 West Brown Deer Road
 Attn: Kelly Rodellii
 Brown Deer, WI 53209

(d) Internal Revenue Service
 PO Box 21126
 Philadelphia, PA 19114

M & T Mortgage Corp
 1 Fountain Plaza, 7th Floor
 Buffalo, NY 14203

Salisbury Mall Ltd. Partnership
 1776 Gramma Ave.
 Henderson, NC 27536

State of New Jersey
 New Jersey Division of Taxation
 Information and Publications Branch
 PO Box 281
 Trenton, NJ 08695-0281

Texas Comptroller of Public Accounts
 Post Office Box 13528
 Capitol Station
 Austin, TX 78711-3528

Virginia Department of Taxation
 Office of Customer Services
 Post Office Box 1115
 Richmond, VI 23218-1115

Wachovia Bank, N.A.
 225 Water St.
 Jacksonville, FL 32202

Addresses marked (c) above for the following entity/entities were corrected as required by the USPS Locatable Address Conversion System (LACS).

BIERNACKI, VALERIE J
 2900 NE COUNTY ROAD
 # 329
 ANTHONY, FL 32617

CALLAHAN, BRIAN A
 1559 SE 80TH STREET
 OCALA, FL 34480

CANDOW, DONNA J
 6601 NW 52ND AVE
 OCALA, FL 34482

FREED, DIANA M
 300 HIGH ST
 TROY, PA 16947

GRIFFIN, ERIN
 131 BACK ROAD
 MASHPEE, MA 02649

HOPP, DIANE
 6 WOODLAND LAKES DRIVE
 PETERSBURG, IL 62675

Jose Maldonado
 c/o Kevin E. Mangum, Esq.
 Mangum & Associates, P.A.
 5100 Hwy. 17-92, Suite 300
 Casselberry, FL 32707

LEAHY, JENNIFER D
 2900 NE CR 329
 ANTHONY, FL 32617

Lakehills Center at Laguna, LLC.
 3 Imperial Promenade St. 820,
 South Coast Metro, CA 92707

PALLES, AILENE
 4255 W HUMPHREY STREET
 3124
 TAMPA, FL 33614

ROBERTS, JANEIL L
 11691 SW 58TH CIRCLE
 OCALA, FL 34476

Randy T & Crystal J Farnsworth
 7176 Burt Bergen Road
 Brandyville, TN 37026

The Grace Bauer Group, Inc.
 16970-3 San Carlos Blvd. #141
 Fort Myers, FL 33908

WAGES-BEAD, KIMBERLY E
 460 SPRING LANE
 OCALA, FL 34472

Jose Maldonado
 c/o Kevin E. Mangum, Esquire
 Mangum & Associates, P.A.
 5100 Hwy. 17-92, Suite 300
 Casselberry, FL 32707

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)ACE American Insurance Company

(u)Assured Guaranty Corp.

(u)Bank of America National Association

(u)Bank of America, National Association as S

(u)Bank of America, National Association, as

(du)Bank of America, National Association, as

(u)Bradford Village Condominium Trust

(u)Branch Banking & Trust Company

(u)Integrity Field Services, Inc.

(u)Jay Oyler

(u)LPP Mortgage, Ltd. and LNV Corporation

(u)Matthew Zarrabina and Key Realty Group, LL

(u) Nationwide Title Clearing

(u) Neasham Investments, LLC

(u) Ohio Bureau of Workers Compensation

(u) RL Regi-FL Cutler Ridge LLC

(u) Regions Bank

(u) School Street Condominium Trust

(u) Sian Ocean Residences Condo Assoc Inc

(u) The Bank of New York Mellon Corporation

(u) The City of Charlotte

(u) The State of Michigan, Department of Treas

(u) U.S. Bank National Association

(du) U.S. Bank National Association,

(d) U.S. Bank National Association, as Trustee
 c/o Kevin L Hing
 Shapiro & Fishman, LLP
 4630 Woodland Corporate Blvd
 Suite 100
 Tampa, FL 33614-2429

(d) United States Department of Housing and Ur

(u) West Virginia State Tax Dept.

(d) 24/7 Call Capture
 21700 Oxnard St (Suite 1730)
 Woodland Hills, CA 91367-7591

(d) ASM Capital III, L.P.
 7600 Jericho Turnpike, Suite 302
 Woodbury, NY 11797-1705

(d) ASM Capital, L.P.
 7600 Jericho Turnpike, Suite 302
 Woodbury, NY 11797-1705

(d) American Express Centurion
 P.O. Box 360001
 Fort Lauderdale, FL 33336-0001

(d) Archon Bay Capital, LLC
 P.O. Box 14610
 Surfside Beach, SC 29587-4610

(d) Argo Partners
 12 West 37th Street, 9th Floor
 New York, NY 10018-7480

(d) Bank of the Ozarks as Successor*
 c/o Patti W. Halloran, Esq.
 Gibbons, Neuman et al.
 3321 Henderson Blvd.
 Tampa FL 33609-2921

(d) Barron & Stadfeld, P.C.
 100 Cambridge Street
 Suite 1310
 Boston, MA 02114-2570

(d) Bella Toscana Homeowners Association, Inc.
 c/o Taylor & Carls, PA
 150 N. Westmonte Drive
 Altamonte Springs, FL 32714-3342

(d) Blue Heron Micro Opportunities Fund, LLP
 P.O. Box 14610
 Surfside Beach, SC 29587-4610

(d) Bowie CAD et al
 co Michael Reed
 P.O. Box 1269
 Round Rock, TX 78680-1269

(d) Brodie Calder & Laura Calder
 c/o Schuyler Stewart Smith
 118 W. Adams Street, Suite 800
 Jacksonville, FL 32202-3866

(u) City of Atlanta
 Bureau of Housing & Code Compliance
 55 Trinity Ave. SW #3450
 GA 30335

(d) Corre Opportunities Fund, L.P.
 1370 Avenue of the Americas, 29th Floor
 New York, NY 10019-4619

(d) Craig Crowell & Lyndsi Crowell
 c/o Schuyler Stewart Smith
 118 W. Adams Street, Suite 800
 Jacksonville, FL 32202-3866

(d)Crowe Horwath,LLP
c/o Legal Group - 7th Floor
PO Box 3697
Oak Brook, IL 60522-3697

(d)D.S. Murphy & Associates
5400 Laurel Springs Parkway,
Ste 407
Suwannee, GA 30024-6064

(d)Dimension Data
P.O. Box 403667
Atlanta, GA 30384-6775

(d)First American Capital LLC
c/o Jon Krigsman
7286 Siena Way
Boulder, CO 80301-3722

(d)Garten, John P.
75 Pauma Valley Drive
Colorado Springs, CO 80921-2825

(d)Great Atlantic Realty, Inc.
C/O Joseph & Marees, P.A.
4035 Atlantic Boulevard
Jacksonville, FL 32207-2036

(d)Guaranty Bank
c/o Charles Sebesta
8333 Douglas Ave.
Dallas, TX 75225-6581

(d)Hays, Cynthia L.
7510 Haas Hills Ln
Belleville, IL 62223-7649

(d)Houston Live Oak Lofts Condo. Assoc.
c/o Kristi Slaughter, Esq.
808 Travis St., #2600
Houston, TX 77002-5778

(d)IKON Financial Services
Bankruptcy Administration
1738 Bass Road
PO Box 13708
Macon, GA 31208-3708

(d)Jody McKnight & Lacy McKnight
c/o Schuyler Stewart Smith
118 W. Adams Street, Suite 800
Jacksonville, FL 32202-3866

(d)Johnson Bank, a Wisconsin Banking corporat
6700 Washington Avenue
Racine, WI 53406-3926

(d)Jumbolair, Inc.
c/o Jeremy Thayer
1201 NE 77th Street
Ocala, FL 34479-8312

(d)Koenig, Mark
247 Oak St
Mayville, WI 53050-1559

(d)Lender Processing Services, Inc.
c/o Donald A. Workman, Esq.
Baker & Hostetler LLP
1050 Connecticut Ave, NW, Suite 1100
Washington, DC 20036-5304

(d)Lex Inc.
1912 Woodford Road
Vienna, VA 22182-3700

(d)Liquidity Solutions Inc
One University Plaza Ste 312
Hackensack, NJ 07601-6205

(d)Microsoft Corporation and Microsoft Licens
c/o Maria A. Milano
Riddell Williams PS
1001 Fourth Ave., Ste 4500
Seattle, WA 98154-1065

(d)Miller, Douglas R.
3333 Bedford Lane
Germantown, TN 38139-8028

(d)MountainView Capital Holdings, L.L.C.
c/o R. Patrick Vance
Jones Walker
201 St. Charles Avenue, Suite 5100
New Orleans, LA 70170-5101

(d)Natixis Real Estate Capital Inc.
c/o Jeffrey N. Rich
599 Lexington Avenue
New York, NY 10022-6030

(d)New Jersey Dept of Banking & Insurance
Thomas Hunt, Assistant Division Director
P.O. Box 040
Trenton, NJ 08625-0040

(d)Oasis at Pearl Lake Condominium Associatio
c/o Taylor & Carls, PA
150 N. Westmonte Drive
Altamonte Springs, FL 32714-3342

(d)Paswell, Maria
6802 Moore Street
Arvada, CO 80004-1424

(d)Pinellas County Tax Collector(TW)
P O Box 10834
Clearwater, FL 33757-8834

(d)Plainfield Specialty Holdings V Inc.
c/o Scott K. Rutsky
1585 Broadway
New York, NY 10036-8200

(d)RN, Inc. d/b/a PIP Printing and Marketing
11 S.W. 1st Avenue
Ocala, FL 34471-1101

(d)Ray & Sherman, LLC
One Securities Centre
3490 Piedmont Rd. Ste 700
Atlanta, GA 30305-4806

(d)Red Rock Financial Services
7251 Amigo Street #100
Las Vegas, NV 89119-4375

(d)Republic Bank
C/O Larry Foyle, Esq
PO Box 800
Tampa, FL 33601-0800

(u)Roth /Ultimate Staffing Co.
Ledgent;Adams & Martin Group
333 City Blvd West Suite 100

(d)Saxon Mortgage Services, Inc.
c/o Brad W. Hissing, Esq.
P.O. Box 800
Tampa, FL 33601-0800

(d)Selene RMOF REO Acquisition II, LLC
c/o R. Scott Shuker, Esq.
P.O. Box 3353
Orlando, FL 32802-3353

(d)Selene Residential Mortgage Opportunity Fu
c/o R. Scott Shuker, Esq.
P.O. Box 3353
Orlando, FL 32802-3353

(d)Sonar Credit Partners, LLC
200 Business Park Drive
Suite 201
Armonk, NY 10504-1751

(d)Sovereign Bank
c/o Greenberg Traurig, P.A.
Attn: Robert Soriano
625 E. Twiggs Street
Suite 100
Tampa, FL 33602-3925

(d)Tennessee Dept of Financial Institute
Eric Rogers
414 Union Street, #1000
Nashville, TN 37219-1787

(d)The Enclave at Windsor Hills Homeowners As
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150 N. Westmonte Drive
Altamonte Springs, FL 32714-3342

(d)The Platt Group, PLLC
13978 Portrush Ct.
Herriman, UT 84096-6793

(d)Tradeweb LLC
Harborside Financial Center
2200 Plaza Five
Jersey City, NJ 07311-4006

(u)U.S. Bank National Association, as Trustee

(d)USAmeriBank
c/o Patrick T. Lennon
P.O. Box 1531
Tampa, Fl 33601-1531

(d)Upstreet Developments, LLC
c/o Adam B. Wiens
633 Seventeenth Street, Suite 2700
Denver, CO 80202-3662

(d)Varsity Contractors Inc.
P.O. Box 1692
Pocatello, ID 83204-1692

(d)Wachovia Bank, N.A.
c/o Craig I. Kelley
1665 Palm Beach Lakes Blvd.
Suite 1000
West Palm Beach, FL 33401-2109

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Altamonte Springs, FL 32714-3342

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(u)Christopher & Brandi Wallace

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(u) Larry and Debbie Young

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(u) Paul Allen

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(u) William P. Hickey III

End of Label Matrix
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Bypassed recipients 124
Total 4573