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UNITED STATES BANKRUPTCY COURT
DISTRICT OF ARIZONA

In Re: BCE WEST, L.P., et al., Debtors. EID#38-3196719	Chapter 11 Case Nos. 98-12547 through 98-12570 ECF CGC Jointly Administered
LAUREN B. ARCH, Movant, vs. B.C. GREAT LAKES, L.L.C. d/b/a BOSTON MARKET RESTAURANT, STORE NO. 419, Respondent.	EIGHTEENTH JUDICIAL CIRCUIT DU PAGE COUNTY, WHEATON, ILLINOIS Case No. 98 SC 5192 **MOTION FOR AN ORDER FOR RELIEF FROM THE AUTOMATIC STAY AND REQUIREMENT TO FILE OBJECTION**

TO: THE HONORABLE CHARLES G. CASE, J.U.S.B.C.

Lauren B. Arch, creditor and movant, moves for an order as follows:

1. Debtor B.C. GREAT LAKES, L.L.C., individually, and doing business as Boston Market, Store No. 419, has filed a petition for relief under Chapter 11 of the U.S. Bankruptcy Code.

2. Movant/creditor, Lauren B. Arch, was injured while a patron at a Boston Market, in the State of Illinois, DuPage County, on September 26, 1996. As a result thereof, a complaint was filed in the Circuit Court of the 18th Judicial Circuit, DuPage

County, Illinois on September 28, 1998, naming B.C. GREAT LAKES, L.L.C., individually, and doing business as Boston Market, Store No. 419.

3. Debtor was covered by insurance through the Wausau Insurance Company at the time of the September 26, 1996 accident.

4. The insurance provided liability coverage in the aggregate amount of $1,000,000.00.

5. In light of the fact that the Boston Chicken defendants were insured by Wausau Insurance on the date of the September 26, 1996 incident, movant, Lauren B. Arch, respectfully requests that the U.S. Bankruptcy Court enter an order lifting the automatic stay to the extent of liability coverage provided by the liability insurance company issued to Wausau Insurance Company.

6. Therefore, pursuant to Section 362 of the U.S. Bankruptcy Code, movant prays that this Court enter an order granting relief to movant, Lauren B. Arch, and lifting the automatic stay permitting her to proceed with her liability cause of action in the 18th Judicial Circuit, DuPage County, State of Illinois, to the extent of the liability insurance coverage available to defendant/debtors.

DATED: July 6, 1999

BY: _____
John J. Piccione
One of the Attorneys for Movant

PICCIONE, KEELEY & ASSOCIATES, LTD.
Attorneys of Record for Movant

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