

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS

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In re)	Chapter 7, No. 07-43128-JBR	
)		
GAILON ARTHUR JOY)		
)		
Debtor)		
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GAILON ARTHUR JOY)	Adv. Proceeding No. 07-4173	
)		
Plaintiff)		
)		
v.)		
)		
THREE ANGELS BROADCASTING)		
NETWORK, INC.,)		
DANNY LEE SHELTON,)		
JOHN P. PUCCI, ESQ.,)		
GERALD S. DUFFY, ESQ.,)		
FIERST, PUCCI & KANE, LLP,)		
and)		
SIEGEL BRILL GRUEPNER)		
DUFFY & FOSTER, P.A.)		
)		
Defendants)		
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MOTION TO RESCHEDULE JANUARY 24, 2007 HEARING ON MOTION BY DEFENDANTS THREE ANGELS BROADCASTING NETWORK, INC. AND DANNY LEE SHELTON TO DISMISS ADVERSARY PROCEEDING

To the HONORABLE JOEL B. ROSENTHAL, Bankruptcy Judge:

Now come Three Angels Broadcasting Network, Inc. ("3ABN") and Danny Lee Shelton ("Shelton"), defendants in the above-captioned adversary proceeding, and hereby move to reschedule the hearing currently set for January 24, 2008 at 2:30 p.m. on their Motion to Dismiss Adversary Proceeding ("Motion to

Dismiss"). In support of this request, 3ABN and Shelton respectfully represent as follows:

1. On November 20, 2007, 3ABN and Shelton filed their Motion to Dismiss. Subsequently, the Court set a hearing on the Motion to Dismiss for January 24, 2008, at 2:30 p.m. (hereinafter "Hearing").

2. On or about December 18, 2007, the other co-defendants in this action (John P. Pucci, Gerald S. Duffy, Jerrie M. Hayes, Fierst, Pucci & Kane, LLP and Siegel Brill Gruepner Duffy & Foster, P.A.) filed their answer to the Plaintiff's Complaint, and said answer supports the position of 3ABN and Shelton as set forth in the Motion to Dismiss.

3. 3ABN and Shelton recently learned that the Defendant John Pucci (who also represents 3ABN and Shelton in connection with their action against the Debtor in the U.S. District Court for the District of Massachusetts entitled Three Angels Broadcasting Network, Inc., an Illinois non-profit corporation and Danny Lee Shelton v. Gailon Arthur Joy and Robert Pickle, pending as Case No. 4:07-cv-40098-FDS), has long standing vacation plans for the week of January 23 to January 27, 2008, and therefore, will not be available for the January 24th Hearing. 3ABN and Shelton believe that Attorney Pucci's attendance at the Hearing will be helpful to the Court's consideration of the Motion to Dismiss.

4. Accordingly, 3ABN and Shelton respectfully request that the Hearing be rescheduled to a date that would enable Attorney Pucci to attend. In addition to the week of January 23, 2008, Attorney Pucci is not available from February 4 to 18, 2008. In

order to enable other Defendants to attend as well, the undersigned confirmed that Attorney Gerald Duffy will not be available from February 25 to March 7, 2008. The undersigned has confirmed with all parties (including counsel for the Plaintiff/Debtor) that they would be available on January 31, 2008, and no party has voiced an objection to rescheduling the Hearing to January 31, 2008. Furthermore, there is another matter scheduled for hearing on January 31st in the underlying Chapter 7 case.

WHEREFORE, 3ABN and Shelton respectfully request that the Hearing be rescheduled to January 31, 2008, or to another date that would be convenient to the Court.

THREE ANGELS BROADCASTING
NETWORK, INC.
DANNY LEE SHELTON

Dated: December 20, 2007

By: /s/ George I. Roumeliotis
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Defendants)		
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CERTIFICATE OF SERVICE

I, GEORGE I. ROUMELIOTIS, ESQ. of the law firm of HENDEL & COLLINS, P.C., 101 State Street, Springfield, Massachusetts, do hereby certify that on the 20th day of December, 2007, I electronically filed the Motion to Reschedule Hearing on the Motion of Three Angels Broadcasting Network, Inc. and Danny Lee Shelton to Dismiss Adversary Proceeding. I further hereby certify that upon receipt of the Notice of electronic service of

said Motion, a copy thereof will be served by first class mail, post prepaid, to any of the parties listed on the attached Exhibit "A" not noted as having received electronic service, said service being made on the 20th day of December, 2007.

/s/ George I. Roumeliotis
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EXHIBIT "A"

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