

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS

In re GAILON ARTHUR JOY <div style="text-align: right;">Debtor</div>)))))))	Chapter 7, No. 07-43128-JBR
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**SIXTH MOTION TO EXTEND TIME TO OBJECT TO DISCHARGE
OR TO DETERMINE THE DISCHARGEABILITY OF A DEBT**

To the HONORABLE JOEL B. ROSENTHAL, Bankruptcy Judge:

Now comes Three Angels Broadcasting Network, Inc., ("3ABN"), a creditor and party in interest, by and through its bankruptcy counsel, Joseph B. Collins, Esq., and moves this Honorable Court, pursuant to Bankruptcy Rule 4004(b), to extend the deadline for the filing of a complaint objecting to the Debtor's Discharge pursuant to 11 U.S.C. §727(a) or a complaint to determine the dischargeability of a debt pursuant to 11 U.S.C. §523(a). In support of this Motion, 3 ABN respectfully represents as follows:

1. On August 14, 2007, the Debtor filed a Voluntary Petition under the provisions of Chapter 7 of the United States Bankruptcy Code.

2. Janice G. Marsh is the duly appointed Chapter 7 Trustee in this case and continues to serve in that capacity.

3. On September 17, 2007, the Debtor's Section 341 meeting was held. On October 4, 2007, the Trustee filed the Report of No Distribution.

4. 3ABN says that it was not listed as a creditor on the Debtor's Bankruptcy Schedules and that additional time is needed to investigate whether cause exists for the filing of a complaint objecting to the Debtor's discharge or a complaint to determine the dischargeability of a debt.

5. Furthermore, pursuant to an Order of the Court entered on March 3, 2008, 3ABN issued a Subpoena to the Debtor regarding the production of documents and to conduct a Rule 2004 Examination. That Examination was scheduled for April 15, 2008. Notwithstanding that the Subpoena requested that documents were to be produced several days earlier, the Debtor did not produce any documents until he arrived for the April 15th Examination. Furthermore, 3ABN states that the documents the Debtor did produce were minimal and were not responsive to the scope of the request. Accordingly, as 3ABN did not have any substantive documents to review, the Examination did not go forward. 3ABN did reschedule the Rule 2004 Examination, and it did go forward on September 9, 2008, notwithstanding that no further documents were produced by the Debtor in response to the document production request posited to the Debtor by 3ABN in connection with that examination.

6. The undersigned counsel received the voluminous transcript from the deposition just yesterday (containing 198 pages), and has now started reviewing its content for accuracy and to determine whether sufficient grounds exist as a result of the Debtor's testimony to object to the Debtor's discharge or to determine the dischargeability of a particular claim against the Debtor. 3ABN is also exploring its options with respect to the apparent continuing lack of cooperation regarding the Debtor's failure to produce the documents requested by 3ABN. 3ABN would like to accomplish this review and analysis prior to the preparation of any Complaint objecting to the Debtor's Discharge or to determine the dischargeability of debt. As the current deadline is later this week (September 26, 2008), 3ABN proposes a

further extension of time in which to file a complaint objecting to the Debtor's discharge or the dischargeability of debt. 3ABN proposes an extension of approximately one month, to October 27, 2008.

WHEREFORE, 3ABN respectfully requests that the final date for filing a complaint objecting to the Debtor's discharge or a complaint to determine the dischargeability of a debt be further extended to October 27, 2008, and for such other and further relief as the Court deems just and proper.

THREE ANGELS BROADCASTING
NETWORK, INC.

Dated: September 23, 2008

By: /s/ George I. Roumeliotis
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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 23rd day of September, 2008, I electronically filed the Sixth Motion to Extend Time to Object to Discharge or to Determine the Dischargeability of a Debt. I further hereby certify that upon receipt of the Notice of electronic service of this Motion, a copy of said Motion will be served by first class mail, postage prepaid, to any of the parties listed below not noted as having received electronic service, said service being made on the 23rd day of September, 2008:

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