

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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In re:

William J. Foley,

Debtor

Case No. 14-31425

Chapter 13

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**MOTION OF WATERCREST INVESTMENTS  
FOR RELIEF FROM AUTOMATIC STAY**

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\_\_\_\_\_ Watercrest Investments, the current landlord of the debtor (hereinafter referred to as “the movant”), through its attorney, Robert N. Meyeroff, hereby moves the court for relief from the automatic stay pursuant to section 362 of the Bankruptcy Code and, in support of said motion, alleges as follows:

1. That the movant is the landlord of the debtor. The apartment leased to the debtor is located at 1962 North Prospect Avenue, Apt. 701, Milwaukee, Wisconsin. The movant filed an eviction action against the debtor on July 23, 2014 in the circuit court of Milwaukee County under Case No. 14-SC-20023. The eviction case ended in an order dated September 8, 2014 that William Foley vacate the aforementioned premises by September 15, 2014.
2. The eviction case is based on the fact that, at the present time, William Foley owes the movant \$7,958.08 in back rent.

WHEREFORE, the movant requests that the automatic stay as it pertains to the above-mentioned eviction action be terminated pursuant to Sec. 362(d) of the bankruptcy code so that the movant may continue the eviction action by obtaining a Writ of Restitution to the sheriff to have William Foley evicted and that any order entered pursuant to this

motion be effective immediately upon its entry.

Date this 24<sup>th</sup> day of September, 2014.

**By: ROBERT N. MEYEROFF**

*s/Robert N. Meyeroff*  
Attorney for Movant  
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