

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS

In re)
) Chapter 7, No. 07-43128-JBR
GAILON ARTHUR JOY)
)
)
Debtor)
)
)

**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., ("3 ABN"), 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. 3 ABN 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.

WHEREFORE, 3 ABN 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 extended to January 16, 2008, and for such other and further relief as the Court deems just and proper.

THREE ANGELES BROADCASTING
NETWORK, INC.

Dated: November 8, 2007

By: /s/ Joseph B. Collins
JOSEPH B. COLLINS, ESQ.
(BBO No. 092660)
HENDEL & COLLINS, P.C.
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CERTIFICATE OF SERVICE

I, JOSEPH B. COLLINS, ESQ. of the law firm of HENDEL & COLLINS, P.C., 101 State Street, Springfield, Massachusetts, do hereby certify that on the 8th day of November, 2007, I electronically filed the 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 8th day of November, 2007:

Richard T. King, Esq.
OFFICE OF THE U.S. TRUSTEE
446 Main Street, 14th Floor
Worcester, MA 01608

Janice G. Marsh, Trustee
THE MARSH LAW FIRM, PC
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Worcester, MA 01608

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