

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

In re)	Case No. 07-43128-JBR
Gailon Arthur Joy,)	Chapter 7
Debtor)	

TRUSTEE'S MOTION FOR AN ORDER OF CONTEMPT AND
FOR SANCTIONS

Janice G. Marsh, the trustee, requests the court to enter an order of contempt against the debtor, Gailon Arthur Joy, and to award her appropriate sanctions.

1. On August 14, 2007, the debtor, Gailon Arthur Joy, commenced this case; immediately thereafter, the trustee was appointed.
2. Three Angels Broadcasting Network, Inc., and its officers, directors, shareholders and employees, including Danny Shelton (collectively "Buyers") informed the trustee that the debtor had not listed on his schedules certain property, specifically, domain names and a counterclaim against the Buyers that arose prepetition ("Property").
3. At the 341 meeting, the debtor failed to testify about the Property.
4. The trustee filed a [#33] motion to sell the Property to the Buyers.
5. On December 18, 2007, the court conducted a hearing.
6. At the hearing, the court "ordered the debtor to provide all requested information to the chapter 7 trustee within 30 days." [#50]
7. The court has continued the December 18 hearing to January 31, 2008, at 10:30 am.
8. After the hearing on December 18, but before the trustee had received the court's order, the trustee telephoned the debtor's attorney to find out his fax number.
9. She then sent a fax to the debtor's attorney to request specific information. Please see the attached Exhibit.
10. January 17, 2008, was the deadline for the debtor to have provided the information to the trustee.
11. The trustee has received no response from the debtor.

12. The trustee seeks an order of contempt against the debtor and appropriate sanctions.

WHEREFORE, Janice G. Marsh, the trustee, requests the court

1. to enter an order of contempt against the debtor;
2. to award appropriate sanctions in favor of the trustee; and
3. to grant such further and other relief as is just.

Respectfully Submitted,

/s/ Janice G. Marsh
Janice G. Marsh, Trustee
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Worcester, MA 01608
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CERTIFICATE OF SERVICE

Janice G. Marsh certifies that, on this date, she served this document by mail, unless otherwise indicated or unless notice is received electronically, to the following:

Gailon Arthur Joy dba Nemco PO Box 1425 Sterling, MA 01564	Laird J. Heal 3 Clinton Road PO Box 365 Sterling, MA 01564 Debtor's Attorney	Richard T. King Assistant United States Trustee 446 Main Street, 14 th Floor Worcester, MA 01608
Three Angels Broadcasting Network, Inc. c/o Joseph B. Collins 101 State Street Springfield, MA 01103		

Dated: January 24, 2008

/s/ Janice G. Marsh
Janice G. Marsh