

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
<i>Caption in Compliance with D.N.J. LBR 9004-1(b)</i> Obermayer Rebmann Maxwell & Hippel LLP Edmond M. George, Esquire Michael D. Vagnoni, Esquire (pro hac vice) Turner N. Falk, Esquire 1120 Route 73, Suite 420 Mount Laurel, NJ 08054-5108 Telephone: (856) 795-3300 Facsimile: (856) 482-0504 E-mail:edmond.george@obermayer.com michael.vagnoni@obermayer.com turner.falk@obermayer.com Counsel to the Debtor and Debtor in Possession	
In re:	Chapter 11
ALUMINUM SHAPES, L.L.C.,	Case No. 21-16520-JNP
Debtor.	

**DEBTOR'S RESPONSE TO THE MOTION OF FORD MOTOR COMPANY FOR
RELIEF FROM THE AUTOMATIC STAY**

Aluminum Shapes, L.L.C., the debtor and debtor-in-possession in the above referenced proceeding (the "Debtor"), by and through its undersigned counsel, Obermayer Rebmann Maxwell & Hippel LLP, hereby files these Objections to the Motion of Ford Motor Company for relief from the automatic stay as to the Debtor's 2017 Ford F350 truck. The Debtor avers that there is no cause for the requested relief, in that the vehicle is necessary for the Debtor's reorganization, and there is over \$35,000.00 in equity in the vehicle.

1. The Debtor is a manufacturer of extruded aluminum, with a principal place of business at 9000 River Road, Delair, New Jersey.

2. The Debtor is in the process of selling all of its assets, in a court approved auction scheduled for October 25th, 2021.

3. The Debtor entered into an Asset Purchase Agreement (“APA”) to sell all of its assets to a Stalking Horse purchaser, CGPN, LLC.

4. Included in the sale contemplated by the APA, is the Debtor’s 2017 Ford F350 truck (Serial No. FT8W3B60HEE23387), (the “Vehicle”).

5. Cause does not exist to grant Ford relief from stay as to the Vehicle. The Debtor owes only \$6,600.00 on the Vehicle worth over \$44,000.00, according to Ford’s moving papers See Certification of Ford at par 3.B. The defaults are *de minimis*, in comparison to the substantial equity cushion in the Vehicle.

6. The Vehicle is necessary to the Debtor’s reorganization and its loss will impair the Debtor’s obligations under the APA.

7. The Debtor will sell the Vehicle at auction, and following closing pay Ford in full on its lien on the Vehicle. The Debtor will provide in the sale order for the liens of Ford to trace to the proceeds of sale.

8. Accordingly, cause does not exist for granting Ford relief from stay as to the Vehicle.

WHEREFORE, the Debtor prays this court enter an order in the form attached, denying the Motion, and providing for the Debtor to sell the Vehicle and provide the proceeds to Ford in satisfaction of its liens and claims.

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Respectfully submitted,

Dated: October 19, 2021

By: /s/ Edmond M. George
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