

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)**

)	
)	
In re:)	Chapter 11
)	
TMST, Inc.)	Case Nos. 09-17787,
f/k/a Thornburg Mortgage, Inc., <i>et al.</i> , ¹)	17790-17792-DK
)	
Debtors.)	(Jointly Administered under Case
)	No. 09-17787)
)	
ANNE-DRUE M. ANDERSON, DAVID)	
A. ATER, THOMAS F. COOLEY,)	
ELLIOT R. CUTLER, IKE KALANGIS,)	
FRANCIS I. MULLIN, III and GARRETT)	
THORNBURG)	
)	
Movants)	
)	
v.)	
)	
JOEL I. SHER, CHAPTER 11 TRUSTEE)	
FOR TMST, INC. f/k/a THORNBURG)	
MORTGAGE, INC., <i>et al.</i>)	
)	
Respondent)	

**AMENDED NOTICE OF MOTION FOR RELIEF FROM THE
AUTOMATIC STAY AND HEARING THEREON**

Anne-Drue M. Anderson, David A. Ater, Thomas F. Cooley, Elliot R. Cutler, Ike Kalangis, Francis I. Mullin, III and Garrett Thornburg (collectively referred to herein as “Movants”), have filed a motion with the Court seeking relief from the automatic stay of 11 U.S.C. § 362(a) to enable payments of Movants’ incurred defense costs consistent with the express terms of the Executive Liability and Indemnification Policy, with policy

¹ The Debtors in these chapter 11 cases are (i) TMST, Inc., f/k/a Thornburg Mortgage, Inc.; (ii) TMST Acquisition Subsidiary, Inc. f/k/a Thornburg Acquisition Subsidiary, Inc.; (iii) TMST Home Loans, Inc. f/k/a Thornburg Mortgage Home Loans, Inc. and (iv) TMST Mortgage Hedging Strategies, Inc., f/k/a Thornburg Mortgage Hedging Strategies, Inc.

number 7043-1627, and the Excess Policy, with policy number 6802-6720, each issued by Federal Insurance Company (a member of the Chubb Group of Insurance Companies) and the US Specialty/HCC Global Financial Directors, Officers and Corporate Liability Insurance Policy, with policy number 14-MGU-08-A16632. Movants have also sought a waiver of the 14-day stay that would ordinarily be in place pursuant to Federal Bankruptcy Rule 4001(a)(3). Your rights may be affected. You should read these papers carefully and discuss them with your lawyer. (If you do not have a lawyer, you may wish to consult one.)

If you do not want the Court to grant the motion for relief from the automatic stay, or if you want the Court to consider your views on the motion, then by May 17, 2010, you or your lawyer must file a written response with the Clerk of the Bankruptcy Court explaining your position and mail a copy to:

Gary R. Greenblatt
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If you mail rather than deliver, your response to the Clerk of the Bankruptcy Court for filing, you must mail it early enough so that the court will receive it by the date stated above.

The hearing is scheduled for May 24, 2010 at 1:30 pm, in Courtroom 1-B, United States Bankruptcy Court for the District of Maryland, 101 West Lombard Street, Baltimore, MD 21201.

If you or your lawyer do not take these steps by the deadline, the Court may find that you do not oppose the relief sought in the motion and may grant or otherwise dispose of the motion before the scheduled hearing date.

Dated: April 29, 2010

Respectfully Submitted,

/s/ Gary R. Greenblatt

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Counsel for Movants

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of April, 2010, copies of the Notice of Motion for Relief from Stay and Hearing Thereon were served via ECF and/or U.S. Mail, postage prepaid upon all registered ECF users in this case, as well as the parties whose names and addresses are listed below:

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