Hearing date and time: December 16, 2010 11:00 AM E.S.T. Objection deadline: December 5, 2010 9:00 AM E.S.T.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK	
X	
In re:	Chapter 11
SAINT VINCENTS CATHOLIC MEDICAL CENTERS OF NEW YORK, et al.,	Case No10-11963 (CGM)
Debtors.	
X	
X	

AMENDED NOTICE OF MOTION OF JOAN BOWMAN, AS ADMINISTRATRIX OF THE ESTATE OF MICHAEL E. BOWMAN, DECEASED, FOR ENTRY OF AN ORDER GRANTING RELIEF FROM THE AUTOMATIC STAY IMPOSED BY 11 U.S.C. § 362(A)

PLEASE TAKE NOTICE, that upon the annexed affidavit of Susan Dennehy, dated October 26, 2010, and upon all the annexed pleadings and proceedings herein, JOAN BOWMAN, as Administratrix of the Estate of MICHAEL E. BOWMAN, deceased, will move this Court on the 16th day of December, 2010, at 11:00 AM, or as soon thereafter as counsel can be heard, before the Honorable Cecelia G. Morris, United States Bankruptcy Judge, in the United States Bankruptcy Court for the Southern District of New York, at the courthouse located at 1 Bowling Green, New York, New York 10004, for entry of an Order, pursuant to 11 U.S.C. §362(d), lifting the automatic stay imposed by the filing of this Chapter 11 proceeding, for the limited purpose of permitting Movant to proceed with her pending New York State Supreme Court litigation against SAINT VINCENT'S CATHOLIC MEDICAL CENTERS OF NEW YORK AND SAINT VINCENT'S HOSPITAL AND MEDICAL CENTER OF NEW YORK IPA NO. 1, INC. (hereinafter referred to collectively as "Debtor Defendant"), limiting the payment of any verdict, settlement and/or judgment to any applicable policy of insurance

maintained by the Debtor Defendant; and for such other relief as this Court may deem just, proper, and equitable.

PLEASE TAKE FURTHER NOTICE, that answering affidavits, if any, are to be served upon the undersigned within seven (7) days prior to the return date of the within application.

Dated: New York, New York November 22, 2010

DENNEHY LAW FIRM

Attorneys for Movant

By: Susan Dennehy, Esq. (3313) 250 West 57th Street –Suite 724

New York, New York 10107

(212) 974-6100

TO:

HON. CECELIA G. MORRIS UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK 355 Main Street Poughkeepsie, New York 12601

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