

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

IN RE
WILLIAM J. FOLEY

Debtor.

Case No. 14-31425-pp
Chapter 13

Hon. Pamela Pepper

**Response to Notice and Request to Adjourn November 25, 2014 Hearing on Debtor's
Motion to Convert Case from Chapter 13 to Chapter 11 and Request to Correct Record**

Joan M. Shepard, one of the attorneys for Creditors Sandwich Kings, LLC, d/b/a Suburpia, Three Sandwich Kings, LLC, and Layton Sandwich Kings, LLC., requests that the Court to adjourn the November 25 hearing on the Debtor's Motion to Covert Case from Chapter 13 to Chapter 11. The request to adjourn is based on the fact that the undersigned creditors' attorney will be filing an objection to the conversion of the case within the next few days; however, she will be out of town for the holidays due to travel plans set before given notice of the hearing date. The undersigned requests that the date be moved to the next week if possible, on any day except the afternoon of December 2, 2014.

In addition the undersigned requests that the Court correct a scrivener's error in labeling the creditor on the Court's docket "Joan Sandwich Kings, LLC, d/b/a Suburpia, et al." (Dkt ## 50, 51, 53). The Creditor is Sandwich Kings, LLC, d/b/a Suburpia, et al. and the attorney is Joan

M. Shepard. The undersigned apologizes for any inconvenience or confusion this error may have caused.

Dated this 5th day of November, 2014.

Nistler & Condon, s.c.
7000 W. North Avenue
Wauwatosa, WI 53213
jshepard@nistlerlaw.com
bnistler@nistlerlaw.com
Phone: 414-763-1147
Facsimile: 414-988-9572

/S/ Joan M. Shepard
Joan M. Shepard
Wis. State Bar No. 1072649
Brent D. Nistler
Wis. State Bar No. 1033990
Attorney for Creditors