

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION

IN RE	:	CHAPTER 11
	:	
AFH AIR PROS, LLC,	:	CASE NO. 25-10356-PMB
	:	
Debtor.	:	
	:	
<u>LINCOLN AUTOMOTIVE FINANCIAL</u>	:	-----
<u>SERVICES,</u>	:	
	:	
Movant,	:	CONTESTED MATTER
	:	
v.	:	
	:	
AFH AIR PROS, LLC,	:	
	:	
Respondent.	:	
	:	
	:	
	:	

**MOTION FOR COMFORT ORDER UNDER SECTION 362 (c)(4)(A)(ii) CONFIRMING
NO AUTOMATIC STAY IS IN EFFECT**

NOW COMES LINCOLN AUTOMOTIVE FINANCIAL SERVICES (the "Movant")
and moves this Court for relief from the automatic stay and shows the Court as follows:

1.

On March 16, 2025, AFH Air Pros, LLC ("Debtor") filed a Voluntary Petition pursuant
to 11 U.S.C. Chapter 13.

2.

Upon information and belief, Debtor has possession of a 2021 Ford Commercial E350
Cube Van (the "Collateral") vehicle that secures a debt to Movant in the approximate amount
of \$9,182.60. Loan documents are filed with Movant's Proof of Claim, filed as Claim 145-1
on June 20, 2025. Movant's claim has since been disallowed by order (Doc No 800) entered
October 28, 2025.



3.

Debtor is not an obligor on the loan to Movant, nor a party with an interest in the Collateral; as a result the Collateral is not included in the bankruptcy estate. Out of an abundance of caution, Movant is bringing this motion to verify that the automatic stay is not in effect as to the Collateral.

WHEREFORE, Movant prays that this Court:

(a) Issue an order, pursuant to 11 U.S.C. § 362(c)(4)(A)(ii) confirming that the Automatic Stay is not in effect; and

(b) Grant such other and further relief as the Court deems to be just and proper.

This January 16, 2026.

The Law Office of
LEFKOFF, RUBIN, GLEASON, RUSSO & SMITH, P.C.
Attorneys for Movant

By: /s/ Andrew D. Gleason
Andrew D. Gleason
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	:	
Respondents.	:	
	:	
	:	
	:	

CERTIFICATE OF SERVICE

The undersigned, Andrew D. Gleason, hereby certifies that I am, and at all times hereinafter mentioned, was more than 18 years of age, and that I served a copy of the **MOTION FOR COMFORT ORDER UNDER SECTION 362 (c)(4)(A)(ii) CONFIRMING NO AUTOMATIC STAY IS IN EFFECT** electronically. Those not served electronically have been served by depositing same in the United States Mail in properly addressed envelopes with adequate postage on the following by depositing persons or entities at the addresses stated:

AFH Air Pros, LLC
150 S. Pine Island Road, Suite 200
Plantation, FL 33324

David B. Kurzweil
Greenberg Traurig, LLP
Terminus 200 - Suite 2500
3333 Piedmont Road, NE
Atlanta, GA 30305

Jonathan S. Adams
Office of the United States Trustee
362 Richard B Russell Federal Building
75 Ted Turner Drive, SW
Atlanta, GA 30303

This January 16, 2026.

The Law Office of
LEFKOFF, RUBIN, GLEASON, RUSSO & SMITH, P.C.
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