

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION**

In re:  
GREENFIELD SILVER, INC.  
f/k/a Lunt Silversmiths, Inc.

Debtor

Chapter 11  
Case No. 09-32228-HJB

**MOTION FOR ORDER APPROVING PRIVATE SALE OF PROPERTY OF THE  
ESTATE FREE AND CLEAR OF LIENS AND ENCUMBRANCES  
PURSUANT TO 11 U.S.C. §363(b) AND REQUEST TO COMPENSATE**

**(REQUEST TO LIMIT NOTICE)**

Now comes the debtor-in-possession Greenfield Silver, Inc. f/k/a Lunt Silversmiths, Inc. (the “Debtor”) in the above Chapter 11 case, through its counsel, and hereby moves, pursuant to Bankruptcy Code § 363(b) and Bankruptcy Rule 6004-1(c) for authority to sell, by private sale, all of the estate's right, title and interest in a data processing equipment including servers, switches, battery back-ups, Routers, Monitor with Rack, Magic Aire Vert. A/C Unit, Mod. 24-BVX, BVW, S/N 890707246, 115V, 1 PH (collectively the “Computer System”), free and clear of all liens, claims, security interests, charges, encumbrances, and other interests. The Debtor further seeks to compensate Aaron Posnik & Co., Inc. In support thereof, the Debtor respectfully states as follows:

1. On December 18, 2009 the Debtor filed a petition for relief under Chapter 11 of the Bankruptcy Code with this Court.
2. The Debtor intends to liquidate its business and assets through this Chapter 11 case.

3. The matters set forth herein constitute core proceedings pursuant to 28 U.S.C. § 157(b)(2)(A) and (N).

4. In May 2010, this Court authorized a public auction sale of the Debtor's personal property, including manufacturing equipment and machinery, silver and office equipment which was held on May 26 and May 27, 2010 (the "May Auction").

5. This Court approved Aaron Posnik & Co., Inc.'s professional employment to conduct the May Auction, as well payment of its commissions and expenses associated with the May Auction.

6. Robert Milos, President of The New A.D.E., Inc., attended the May Auction and became interested to purchase the Computer System which was presented for sale at the auction, but did not make a bid for it.

7. The Computer System remained unsold after the May Auction.

8. Recently Mr. Milos contacted Aaron Posnik & Co. Inc. to inquire whether the Computer System remained available for purchase and offered to purchase it for Three Thousand and 00/100 (\$3,000.00) Dollars. A copy of an Agreement for Purchase and Sale of Assets is attached as Exhibit A.

9. The Computer System is not encumbered by any liens or security interests by any creditor.

10. The Debtor believes that the sale of the Computer System is authorized by this Court pursuant to 11 U.S.C. § 363(b).

11. The Debtor requests authority to sell the Computer System by private sale to The New A.D.E., Inc.

12. The Debtor believes that a sale of the Computer System by private sale is the best means of liquidating the asset, as the Debtor was previously unable to sell it at the May Auction.

13. The Debtor consulted with a computer professional, who verified that \$3,000 is the fair value for the Computer System.

14. The Debtor requests that this Court authorize payment to Aaron Posnik & Co., Inc. in the amount of \$300.00 (10% of the purchase price) to compensate it for negotiating and coordinating the sale.

15. In connection with the May Auction, Aaron Posnik & Co., Inc. submitted to this Court an Affidavit representing that it (i) is a "disinterested person" as that term is defined in 11 U.S.C. §101(14); (ii) holds no interest adverse to the Debtor; (iii) has no connections with the Debtor, its creditors, or other parties in interest, or their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee; and (iv) has not agreed to share with any person, except members of its firm, the compensation to be paid for services rendered in this case.

16. The Debtor's undersigned attorney, Edward V. Sabella, has previously represented The New A.D.E., Inc. and its related companies, American Discount Exchange, Inc. and the Final Markdown, Inc. in various business and legal matters. All of these companies now or previously shared a common principal, Robert Milos. The undersigned represented Mr. Milos in his personal capacity on one occasion. However, these cases have been closed for the last several years. Neither the undersigned, nor any representative of Shatz, Schwartz and Fentin, P.C. has had any communications with Mr. Milos or any representative of the above-referenced entities relative to this proposed sale. The undersigned only learned of the identity of the proposed buyer through Aaron Posnik & Co., Inc. See Affidavit of Edward V. Sabella attached as Exhibit B.

17. Request is hereby made to limit notice regarding this Motion upon the individuals and entities served with this Motion, which are as follows: the U.S. Trustee, the Debtor, the top twenty unsecured creditors, the creditors committee, Gary Weiner, Esquire as counsel to the creditors committee, and all attorneys who have filed appearances in this case.

18. The Debtor submits that due to the nature of this Motion, no further service is necessary.

WHEREFORE, the Debtor respectfully prays:

1. That this Court authorize the Debtor's motion for sale of the Computer System described herein free and clear of all liens, interests and encumbrances, pursuant to 11 U.S.C. § 363(b);

2. That this Court authorize payment of \$300.00 to Aaron Posnik & Co., Inc. without further application to this Court;

3. That this Court authorize limited notice of this motion as set forth herein;

4. That encumbrances, if any, shall attach to the proceeds of the sale, to the extent that they are valid and perfected, in the same priority as they are entitled to under applicable law; and

5. For such further relief as this Court deems just and proper.

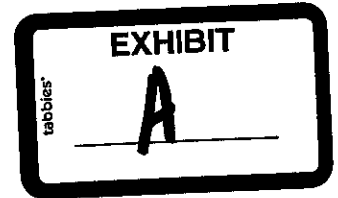
Respectfully submitted this 9<sup>th</sup> day of February, 2011.

SHATZ, SCHWARTZ AND FENTIN, P.C.

By: /s/ Edward V. Sabella  
Edward V. Sabella, Esquire  
esabella@ssfpc.com  
L. Alexandra Hogan, Esquire  
lahogan@ssfpc.com  
BBO #672561

1441 Main Street – Suite 1100  
Springfield, MA 01103  
Telephone - (413) 737-1131  
Facsimile - (413) 736-0375  
For the Debtor

09\0185\Auctioneer\Posnik\computer private sale motion.4801



**AGREEMENT FOR  
PURCHASE AND SALE OF ASSETS**

THIS AGREEMENT dated as of ~~January~~ <sup>Feb.</sup> 9, 2011 is made by The New A.D.E., Inc. (hereinafter "Buyer") and Greenfield Silver, Inc. f/k/a Lunt Silversmiths, Inc. (hereinafter the "Seller").

WHEREAS, the Buyer attended the Seller's public auction sale of assets in May 2010 at which time he became interested to purchase a computer system but did not do so;

WHEREAS, the Buyer now desires to purchase said computer system as it went unsold at the public sale auction; and

WHEREAS, the Seller desires to sell the computer system to the Buyer.

NOW, THEREFORE, in consideration of the premises and the mutual covenants herein contained, the parties hereto agree as follows:

1. Upon the terms and conditions herein set forth, the Seller shall sell to Buyer, and Buyer shall purchase the Seller's data processing equipment including servers, switches, battery back-ups, Routers, Monitor with Rack, Magic Aire Vert. A/C Unit, Mod. 24-BVX, BVW, S/N 890707246, 115V, 1 PH (collectively the "Computer System").
2. The Buyer shall pay the purchase price of Three Thousand and 00/100 (\$3,000.00) Dollars for the Computer System.
3. The purchase and sale of the Computer System and this Agreement are contingent upon approval by the United States Bankruptcy Court for the District of Massachusetts.

IN WITNESS WHEREOF, the parties hereto have duly executed and delivered this Agreement as of the date first above written.

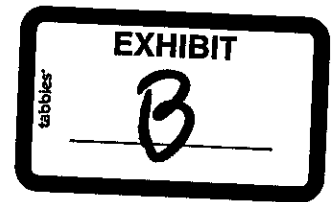
GREENFIELD SILVER, INC.

By: James H. Lunt (West)  
James H. Lunt  
Its President

THE NEW A.D.E., INC.

By: [Signature]  
Robert P. Milos  
Its President

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION



In re:  
GREENFIELD SILVER, INC.  
f/k/a Lunt Silversmiths, Inc.

Debtor

Chapter 11  
Case No. 09-32228-HJB

**AFFIDAVIT OF EDWARD V. SABELLA**

Now comes Edward V. Sabella and respectfully states the following under oath:

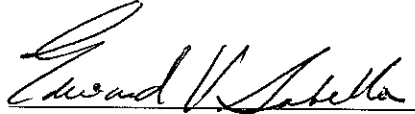
1. I am an equity partner at Shatz, Schwartz and Fentin, P.C. ("SSF").
2. I am a licensed attorney in the Commonwealth of Massachusetts. I am in good standing.
3. While employed with Shatz, Schwartz and Fentin, P.C. and my previous firm of LaCroix and Fuller, I have represented The New A.D.E., Inc. and its related entities, American Discount Exchange, Inc. and the Final Markdown, Inc. in various business and legal matters. All of these companies now or previously shared a common principal, Robert Milos.
4. The undersigned represented Mr. Milos in his personal capacity on one occasion.
5. However, these files have been closed for several years.
6. Neither the undersigned, nor any representative of Shatz, Schwartz and Fentin, P.C. has had any communications with Mr. Milos or any representative of the above-referenced entities relative to this proposed sale.
7. The undersigned only learned of the identity of the proposed buyer through Aaron Posnik & Co., Inc.

8. Neither I, nor my firm, have a conflict of interest due to my previous representations of Mr. Milos or his businesses.

9. I shall amend this statement immediately upon my learning that (A) any of the within representations are incorrect or (B) there is any change of circumstances relating thereto.

10. I declare under the penalty of perjury that the foregoing is true and correct.

SHATZ, SCHWARTZ AND FENTIN, P.C.

  
Edward V. Sabella

Dated: February 9, 2011

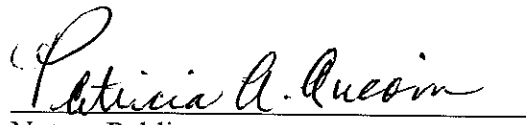
COMMONWEALTH OF MASSACHUSETTS

Hampden, ss.

February 9, 2011

On this February 9, 2011 before me, the undersigned notary public, personally appeared, Edward V. Sabella ~~proved~~ to me through satisfactory evidence of identification, namely the person was known to me, identified by affirmation of a credible witness, or identified in \_\_\_\_\_], to be the person whose name is signed on the preceding or attached document and acknowledged to me that such person is a duly authorized representative of Shatz, Schwartz and Fentin, P.C. and that such person signed such document voluntarily as such person's free act and deed for its stated purpose on behalf of such Shatz, Schwartz and Fentin, P.C.

**PATRICIA A. AUCOM**  
Notary Public  
Commonwealth of Massachusetts  
My Commission Expires April 6, 2012

  
Notary Public  
My Commission Expires:

4/6/2012

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION

In re:

GREENFIELD SILVER, INC. f/k/a

Lunt Silversmiths, Inc.

Debtor

Chapter 11

Case No. 09-32228-HJB

DECLARATION ELECTRONIC FILING

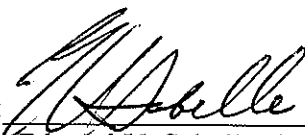
PART I - DECLARATION

I Edward V. Sabella of Shatz, Schwartz and Fentin, P.C., *hereby declare(s) under penalty of perjury* that all of the information contained in the **AFFIDAVIT** (singly or jointly the "Document"), filed electronically, is true and correct. I understand that this *DECLARATION* is to be filed with the Clerk of Court electronically concurrently with the electronic filing of the Document. I understand that failure to file this *DECLARATION* may cause the Document to be struck and any request contained or relying thereon to be denied, without further notice.

I further understand that pursuant to the Massachusetts Electronic Filing Local Rule (MEFLR)-7(a) all paper documents containing original signatures executed under the penalties of perjury and filed electronically with the Court are the property of the bankruptcy estate and shall be maintained by the authorized CM/ECF Registered User for a period of five (5) years after the closing of this case.

Dated: February 9, 2011

Signed:



Edward V. Sabella. (Affiant)

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION

In re:  
GREENFIELD SILVER, INC.  
f/k/a Lunt Silversmiths, Inc.  
Debtor

Chapter 11  
Case No. 09-32228-HJB

**CERTIFICATE OF SERVICE**

I, Edward V. Sabella, counsel to the Debtor in the above-captioned bankruptcy proceeding, do hereby certify that on February 9, 2011, I served electronically and/or by first-class mail, postage prepaid, upon the attached list of interested parties, copies of the Notice of Filing<sup>1</sup> (**attached as Exhibit A**) regarding the following: [135] Motion for Order Approving Private Sale of Property of the Estate Free and Clear of Liens and Encumbrances Pursuant to 11 U.S.C. §363(b) and Request to Compensate (Request to Limit Notice).

Dated this 9th day of February 2011.

Respectfully submitted,  
GREENFIELD SILVER, INC.

By: S/ Edward V. Sabella  
Edward V. Sabella, Esquire  
BBO #436820  
esabella@ssfpc.com  
L. Alexandra Hogan, Esquire  
BBO #672561  
lahogan@ssfpc.com  
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<sup>1</sup> Pursuant to Court order dated December 21, 2009 regarding general notice procedures.

## SERVICE LIST

### U.S. TRUSTEE

Richard T. King, Esquire  
Assistant U.S. Trustee  
446 Main Street, 14th Floor  
Worcester, MA 01608

### UNSECURED CREDITORS COMMITTEE

Gary Weiner, Esquire  
Counsel to Unsecured Creditors Committee  
Weiner and Lange, P.C.  
95 State Street, Suite 918  
Springfield, MA 01103

Alan B. Cabot  
P.O. Box 332  
East Longmeadow, MA 01028

Alan B. Cabot  
1127 Amostown Road  
West Springfield, MA 01089

The 925 Inc.  
9825 Owensmouth Avenue  
Chatsworth, CA 91311-3802

GBG SRL  
c/o AVV. Paola Babboni  
Via Duca D'Aosta 5  
Castelfiorentino, Florence, Italy

### TOP 20 UNSECURED CREDITORS

Laurie Burns  
41 Madison L.P.  
c/o Rudin Management  
345 Park Avenue  
New York, NY 10154

Greenberg, Rosenblatt, Kull & Bitsoli  
P.O. Box 15034  
Worcester, MA 01615-0034

Jonathan L. Flaxer, Esq.  
 Michael S. Weinstein, Esq. (Representing 41  
 Madison L.P.)  
 Golenbock Eiseman Assor Bell & Peskoe LLP  
 437 Madison Avenue  
 New York, NY 10022

American Express  
 P.O. Box 1270  
 Newark, NJ 07101

Victor W. Newmark, Esquire (Representing  
 AmericasMart Real Estate LLC)  
 Wiles & Wiles, LLP  
 800 Kennesaw Avenue, Suite 400  
 Marietta, GA 30060-7946

AmericasMart Real Estate LLC  
 240 Peachtree Street NW  
 Atlanta, GA 30303

Bank of America  
 Business Card  
 P.O. Box 15710  
 Wilmington, DE 19886-5710

**Borda SL**  
**c/o Xavier Cunill**  
**Santiago Rosignol 3**  
**San Vicens de Montalt, 08394**  
**Barcelona Spain**

F.J. Whalen & Company  
 2602 Dallas Trade Mart  
 Dallas, TX 75207

Howard Charles, Inc.  
 180 Froehlick Farms Blvd.  
 Woodbury, NY 11797

**Isabel Cabanillas, S.A.**  
**Avenida Barcelona, 241**  
**Poligono Industrial El Pla**  
**08750 Molins De Rei**  
**Barcelona, Spain**

John W. Foster  
 Foster & Company  
 P.O. Box 79  
 Cos Cob, CT 06807-0079

JR Studios Inc.  
 c/o C2C Resources, LLC  
 56 Perimeter Center East  
 Atlanta, GA 30346

Lyle & Associates  
 230 Spring Street  
 Suite 823  
 Atlanta, GA 30303

**Meraj Exports**  
**Near Iqbal Building**  
**Nai Basti Mohd Ali Road**  
**Baradari, Moradabad 244001**  
**India**

**Osborne Tableware Limited**  
**Imperial Works, Sheffield Road**  
**Sheffield S9 2YL**  
**England**

GBG  
Via Benvenuto Cellini  
11/13 - Loc Sambuca  
50028 Tavarnelle Val Di Pesa, Italy

Stern Leach Company  
P.O. Box 2018  
Attleboro, MA 02703

Sean W. Gilligan  
Gesmer Updegrove LLP  
40 Broad Street  
Boston, MA 02109

The Blessing Bank, Inc.  
c/o Beasley, Hightower & Hartmann, P.C.  
1700 Pacific Avenue, Suite 4450  
Dallas, TX 75201

The 925 Inc.  
9825 Owensmouth Avenue  
Chatsworth, CA 91311-3802

**Wacker**  
**Wacker Industrial Building**  
**11 Mok Cheong Street**  
**Tokwawan Kowloon**  
**Hong Kong**

OTHER INTERESTED PARTIES

Mr. James H. Lunt  
Greenfield Silver Inc., f/k/a  
Lunt Silversmiths, Inc.  
298 Federal Street  
P.O. Box 1010  
Greenfield, MA 01302

**Exhibit A**

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
WESTERN DIVISION**

**In re:  
GREENFIELD SILVER, INC.  
f/k/a Lunt Silversmiths, Inc.**

**DEBTOR**

**Chapter 11  
Case No. 09-32228-HJB**

**NOTICE OF FILING**

**TO THE CREDITORS AND OTHER PARTIES IN INTEREST:**

*PLEASE TAKE NOTICE* that, in the case of Greenfield Silver, Inc. f/k/a Lunt Silversmiths, Inc. (the “Debtor”), the following has been filed/docketed with the above court: [135] Motion for Order Approving Private Sale of Property of the Estate Free and Clear of Liens and Encumbrances Pursuant to 11 U.S.C. §363(b) and Request to Compensate (Request to Limit Notice); (the “Motion”). The Motion requests the Court’s approval for private sale of the property of the estate which consists of a computer system and accessories.

*PLEASE TAKE NOTICE* that the above-referenced Motion with exhibits is available for download in pdf format from the Shatz, Schwartz and Fentin, P.C. website, [www.ssfpc.com](http://www.ssfpc.com). By clicking the “Pleadings/Downloads” button on the left hand side of the home page, the user will be taken to another page within the website from which the above-referenced filing and any and related exhibits can be downloaded for free. A free copy of the Adobe Reader may be downloaded from [www.adobe.com](http://www.adobe.com), which may be used to open these files. In the event you cannot open these files, you may make a written request for paper copies by contacting the undersigned, which request will be satisfied forthwith. The Debtor encourages the parties in interest to review such documents in their entirety.

SHATZ, SCHWARTZ AND FENTIN, P.C.

By: /s/ Edward V. Sabella  
Edward V. Sabella, Esquire

Edward V. Sabella, Esquire  
esabella@ssfpc.com  
BBO #436820  
L. Alexandra Hogan, Esquire  
lahogan@ssfpc.com  
BBO #672561  
1441 Main Street – Suite 1100  
Springfield, MA 01103  
Telephone - (413) 737-1131  
Facsimile - (413) 736-0375

Counsel to Debtor

Dated: February 9, 2011

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