

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

**In re:**

**LUNT SILVERSMITHS, INC.**

**DEBTOR**

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

**MOTION FOR ORDER APPROVING GENERAL NOTICE PROCEDURE**

Lunt Silversmiths, Inc. (the "Debtor"), hereby moves pursuant to Federal Rules of Bankruptcy Procedure ("Bankruptcy Rule") 2002(m) for entry of an order generally approving the form and manner of notice to creditors and other interested parties in the above captioned case. In support of this Motion, the Debtor respectfully represents as follows:

**Background**

1. On this date, Lunt filed a voluntary petition pursuant to Chapter 11 of the Bankruptcy Code commencing the above-captioned case.
2. The Debtor is operating as a debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.
3. No trustee or examiner has been appointed in the Debtor's Chapter 11 case, and no committees have been appointed or designated.
4. The Debtor intends to liquidate its business through this Chapter 11.
5. During the course of the above-captioned case, the Debtor will potentially be responsible to provide service of numerous pleadings, motions, exhibits, orders, and notices, as

well as a liquidation plan and disclosure statement (the “Documents”) to approximately 300 creditors and other interested parties.

6. The Debtor’s cost of copying and mailing the numerous Documents to effectuate service will be substantial and burdensome to the Debtor, especially in light of the fact that the Debtor intends to liquidate as opposed to reorganize its business.

7. The creditors will benefit from the reduced copying and mailing costs.

### **Relief Requested**

8. The Debtor requests an Order generally approving the form and manner of notice procedure in the above-captioned case pursuant to Bankruptcy Rule 2002(m).

9. The Debtor proposes serve a written hardcopy of the Notice of Filing, substantially in the form attached hereto as Exhibit A (the "Notice") to the applicable creditors and/or interested parties, as the case may be.

10. The Notice will direct recipients to the website of Debtor’s undersigned counsel, [www.ssfpc.com](http://www.ssfpc.com), from which the Documents can be downloaded without charge. The Notice provides directions for requesting paper copies of the Documents, which would be furnished immediately upon written request.

11. The Debtor states that service in the form and manner stated herein is sufficient and will significantly reduce costs to the liquidating Debtor.

WHEREFORE, Lunt Silversmiths, Inc., respectfully prays that this motion be allowed and for such further relief as this Court deems just and proper.

Respectfully submitted,

SHATZ, SCHWARTZ AND FENTIN, P.C.

By: /s/ Edward V. Sabella

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Attorneys for the Debtor

Dated: December 18, 2009

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**EXHIBIT A**

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

**In re:**

**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 the undersigned, on behalf of Lunt Silversmiths, Inc. (the “Debtor”) has filed a \_\_\_\_\_ (the “\_\_\_\_\_”) with this Court which addresses the following: \_\_\_\_\_ .

PLEASE TAKE NOTICE that the \_\_\_\_\_, and any exhibits attached thereto, are 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 \_\_\_\_\_ 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.

Respectfully submitted,

SHATZ, SCHWARTZ AND FENTIN, P.C.

By: /s/ Edward V. Sabella

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Attorneys for the Debtor

Dated:

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