John M. Morrison
Anne E. Sherwood
MORRISON SHERWOOD WILSON DEOLA PLLP
401 North Last Chance Gulch • P.O. Box 557
Helena, Montana 59624-0557
(406) 442-3261
(406) 443-7294 facsimile
john@mswdlaw.com
anne@mswdlaw.com

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA HELENA DIVISION

MARIA MOELLER and RON MOELLER,

Plaintiffs,

v.

THE ALIERA COMPANIES, INC.; TRINITY HEALTHSHARE, INC.; TIMOTHY MOSES, SHELLEY STEELE, CHASE MOSES, and DOES 1-10,

Defendants.

Cause No. 6:20-cv-00022-SEH

MOTION FOR PARTIAL RELIEF FROM STAY AND ALTERNATIVE MOTION TO BIFURCATE

COME NOW the Plaintiffs, through counsel, pursuant to 11 U.S.C. § 362(d), and move this honorable court for partial relief from the stay Order of this Court, entered July 16, 2021. Doc. 219. Specifically, Plaintiffs move that the stay

be lifted as to Defendants other than Trinity Healthshare, Inc. As grounds for the motion, plaintiff submit here with the accompanying memorandum brief.

Rule 7.1 Certificate of Conferral

Pursuant to Local Rule 7.1(c)(1), counsel for Plaintiffs conferred with counsel for Defendants and the motion is opposed.

Dated this 6^{th} day of August 2021.

By: /s/ John M. Morrison
JOHN M. MORRISON
MORRISON SHERWOOD WILSON DEOLA PLLP
Attorney for Plaintiffs