

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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| In re: QUEBECOR WORLD (USA) INC., et al, | : | Chapter 11 |
| Debtors | : | Case No. 08-10152 (JMP) |
| | : | Jointly Administered |
| | : | |

**CREDITOR LUCKY ADDEH’S MOTION FOR RELIEF FROM AUTOMATIC
STAY WITH RESPECT TO CLAIM NO. 5714**

Now comes Lucky Addeh, creditor of the above-referenced debtor, Quebecor World (USA) Inc., et al, and pursuant to 11 U.S.C. § 362(d) respectfully moves this Honorable Court for relief from the automatic stay as it applies to his claim for **personal injury** damages he suffered in an accident, caused by the debtor’s negligence. In support of this motion, Lucky Addeh says that:

1. Addeh’s claim for damages arises out of an accident that occurred on December 23, 2007, when he was injured by a printing press while working as a contract laborer at the Consolidated Debtors’ printing business located in Taunton, Massachusetts. The cause of the injury was the negligence of the Debtor.
2. Addeh filed his Proof of Claim on or about November 24, 2008, before the bar-date for such claims, and his claim remains unliquidated and unsecured;
3. The Debtor has objected to Addeh’s claim and seeks to have said claim disallowed.
4. Addeh has been prohibited from bringing an action against the Debtor in state court because of the effect of the automatic stay provisions of 11 U.S.C. §362(a).

5. Through counsel, Addeh has tried, unsuccessfully, to settle his claim against the Debtor pursuant to the Claims Allowance Procedure established by the Court's Claims Procedure Order (Docket No. 1978).

WHEREFORE, Lucky Addeh respectfully requests that the automatic stay be lifted as it applies to his claim for personal injury damages so that he may pursue said claim through a state court action in the Commonwealth of Massachusetts.

LUCKY ADDEH
By his attorney,

/s/ Robert S. Ovoian

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