

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF CONNECTICUT  
BRIDGEPORT DIVISION**

In re:

SEAN DUNNE

Debtor.

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Chapter 7

Bankruptcy Case No.:13-50484 (AHWS)

**MOTION FOR ORDER AUTHORIZING RULE 2004 EXAMINATION**

Richard M. Coan, Trustee of the bankruptcy estate of Sean Dunne, by and through his attorneys, Coan, Lewendon, Gulliver & Miltenberger, LLC, hereby moves for an order authorizing the Rule 2004 Examination of a representative of the National Asset Management Agency, and in support thereof states as follows:

1. On March 29, 2012 Sean Dunne filed for relief under chapter 7 of the United States Bankruptcy Code.
2. Richard M. Coan is the Trustee of the bankruptcy estate of Sean Dunne and is currently serving in that capacity.
3. The National Asset management Agency has information relevant to the assets of the Debtor and/or transfers made by the debtor. The National Asset Management Agency may have other information relevant to the administration of the bankruptcy estate of Sean Dunne.

WHEREFORE, Richard Coan, Trustee seeks an order authorizing the examination of a representative of the National Asset Management Agency, said examination to take place at the offices of Coan, Lewendon, Gulliver & Miltenberger, LLC, 495 Orange Street, New Haven, Connecticut, on May 28, 2013 at 10:00 a.m, or at such other or further time as may be agreed upon by the parties or set forth in a duly issued subpoena.

RICHARD M. COAN, TRUSTEE

By /s/ Timothy D. Miltenberger  
Timothy D. Miltenberger (ct08874)  
Coan, Lewendon, Gulliver & Miltenberger, LLC  
495 Orange St.  
New Haven, CT 06511  
(203) 624-4756  
(203) 865-3673 Facsimile  
[Tmiltenberger@coanlewendon.com](mailto:Tmiltenberger@coanlewendon.com)

**CERTIFICATION**

This is to certify that a copy of the foregoing Motion for 2004 Examination and Proposed Order was mailed, first class mail, postage pre-paid on the 15th day of May, 2013, to:

National Asset Management Agency  
c/o Thomas H. Curran  
McCarter English  
265 Franklin Street  
Boston, MA 02110

/s/ Timothy D. Miltenberger  
Timothy Miltenberger

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**PROPOSED ORDER AUTHORIZING RULE 2004 EXAMINATION**

Upon consideration of Richard M. Coan, Trustee (hereinafter the “Movant”) Motion for Rule 2004 Examination, seeking an order authorizing a Bankruptcy Rule 2004 examination of the National Asset Management Agency, and the Court having determined there is good cause for granting the requested relief as conditioned hereafter:

**IT IS HEREBY ORDERED**, that the Movant may examine a representative of the National Asset Management Agency at the offices of Coan Lewendon, Gulliver & Miltenberger, LLC, 495 Orange Street, New Haven, Connecticut, on May 28, 2013, or at a time as may be agreed to by the parties or set forth in a properly issued subpoena pursuant to Fed. R. Bankr. P. 9016.