

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF COLORADO

In Re:)
ADAM AIRCRAFT INDUSTRIES, INC.)
) Case No. 08-11751-MER
)
) Chapter 7
)

**ARAPAHOE COUNTY TREASURER’S OBJECTION TO TRUSTEE’S PENDING
MOTIONS**

The Arapahoe County, Colorado, Treasurer Objects to Trustee’s Motion to Shorten Notice Period and Pending Motions. In support of its objection states as follows:

1. Arapahoe County Treasurer is a political subdivision of the State of Colorado, authorized to assesses and collect taxes. Arapahoe County Treasurer has first priority secured claim for unpaid ad valorem taxes on Debtors’ Personal Property for tax years 2007 and 2008, respectively, for a total of \$114,189.12. The priority of tax claims and related liens is determined under applicable non-bankruptcy law state law, pursuant to 11 U.S.C. §506; Butner v. U.S. 48, 55 (1979). The tax lien provided does not become effective until the property is assessed and the taxes levied, at which time the theretofore inchoate lien relates back and attaches as of the date authorized for assessment. Wolf v. Antonoff, 161 Colo. App. 473,423 P.2d 840 (1967).
2. Arapahoe County Treasurer further objects to the Trustee’s Motion to Shorten Notice Period and Pending Motions as follows:
 - a. Counsel for the Arapahoe County Treasurer is an ECF filer and just received notice via U. S. Mail, to its clients on March 3, 2008, and objects to the timeliness of service.

- b. Arapahoe County Treasurer objects to the shortening the notice period in that the Treasurer has not been given sufficient time to consider the issues to properly protect and secure its rights and interests.
- c. Arapahoe County Treasurer objects to the Motion Authorizing and Scheduling an Auction to Solicit Bids for the Sale of Substantially all Assets of Debtor's Bankruptcy Estate, Free and Clear of Liens, Claims, Interests and Encumbrances or the Approval thereof in that the Treasurer has not had sufficient time to ensure that provisions are established to set a side estate funds to guarantee payment of its first priority secured claim.

WHEREFORE, the Arapahoe County Treasurer requests the Court to enter an Order denying shortening of the notice period and trustee's pending motions.

Dated: March 6, 2008.

KATHRYN SCHROEDER
ARAPAHOE COUNTY ATTORNEY
By:/s/George Rosenberg
George Rosenberg
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Attorneys for Arapahoe County

CERTIFICATE OF MAILING

This is to certify that on the 6th day of March, 2008, a true and correct copy of the **ARAPAHOE COUNTY TREASURER'S OBJECTION TO TRUSTEE'S PENDING MOTIONS** was served via Lexis/Nexis and U. S Mail to the following persons:

See Exhibit A

/s/ Ranae Johnson
