

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA

In re:)
) Case No.
)
)

MOTION TO AVOID LIEN

The Debtor(s) hereby move the Court pursuant to 11 U.S.C. § 522(f) to avoid the lien of {ENTER CREDITOR NAME} on the following described property:

{ENTER PROPERTY DESCRIPTION}

In support of said Motion, the Debtor submits the following information:

1. The above-mentioned lien is a nonpossessory, nonpurchase money security interest in the described property.
2. The amount of the lien: \$_____
3. The amount of all other liens on the property: \$_____
4. Amount of the impaired exemption: \$_____
5. Value of the subject collateral: \$_____

The Debtor's interest in the property referred to in the preceding paragraph and encumbered by the lien has been claimed as exempt in this bankruptcy case. The existence of the lien impairs the exemptions to which the Debtor would be entitled under 11 U.S.C. § 522(b).

WHEREFORE, the Debtor moves the Court to enter an order avoiding the lien and granting such other relief as may be appropriate.

Date: _____
{ATTORNEY NAME & ADDRESS}

CERTIFICATE OF SERVICE

This is to certify that a true and accurate copy of this Motion to Avoid Lien was served on the parties by placing a copy in the U.S. Mail this _____ day of _____, 2004, at the addresses listed below or attached hereto.

{ENTER NAMES & ADDRESSES OF PARTIES SERVED}

{ATTORNEY NAME}