

UNITED STATES BANKRUPTCY COURT
Southern District of Indiana

In re:)
)
[Name of Debtor(s)],) Case No. (xx-xxxxx)
Debtor (s).)

MOTION TO AVOID (JUDICIAL) LIEN (ON HOUSEHOLD GOODS)
AND NOTICE OF OBJECTION DEADLINE

The debtor(s) hereby move(s) the Court, pursuant to 11 U.S.C. 522(f), to avoid the lien of (name of creditor) on the following (real/personal) property:

[Describe real property by both the common address and legal description or describe personal property by referring to the definition of "household goods" in 11 U.S.C. §522(f)(4)] - referred to as the "Property."

In support of the motion, the debtor(s) state(s) the following:

1. The debtor(s) filed this case on (date) - referred to as the "Petition Date."
2. The creditor obtained a lien on the household goods listed above on (date debt was incurred that lien secures). The above lien is a non-possessory, non-purchase money security interest.

-or-

The creditor obtained a judgment which is a lien on the real property described above. That judgment was obtained pre-petition on (date) in (Court and case number).

3. The value of the Property as of the Petition Date is (value).
4. The other mortgages and/or lien(s) on the Property is/are as follows: [list creditor(s) and lien amount(s)].
5. The lien(s) debtor will be seeking to avoid by separately filed motion(s) is/are as follows: [list creditor(s) and lien amount(s)].

6. The amount of the exemption to which the debtor(s) would be entitled but for the lien is (amount).
7. The creditor's lien is in the approximate amount of (amount).
8. (If applicable) The specific household goods subject to the lien are: [provide list of items from 11 U.S.C. §522(f)(4)].
9. The Property has been claimed as exempt. The lien impairs an exemption of the debtor(s) and is subject to avoidance under 11 U.S.C. §522(f).

NOTICE IS GIVEN that any objection must be filed with the Bankruptcy Clerk within **21 days** from date of service [or such other time period as may be permitted by Fed.R. Bankr.P. 9006(f)]. Those not required or not permitted to file electronically must deliver any objection by U.S. mail, courier, overnight/express mail, or in person at:

(Select the appropriate address.)

Indianapolis

116 U.S. Courthouse
46 East Ohio St
Indianapolis, IN 46204

Evansville and Terre Haute

352 Federal Bldg.
101 NW M.L. King Jr. Blvd.
Evansville, IN 47708

New Albany

110 U.S. Courthouse
121 W. Spring St.
New Albany, IN 47150

The objecting party must ensure delivery of the objection to the party filing the motion.
If an objection is NOT timely filed, the requested relief may be granted.

WHEREFORE, debtor(s) move(s) the Court to enter an order avoiding creditor's (judicial) lien (on household goods) and granting such other relief as appropriate.

/s/ Counsel for Debtor(s)
Counsel for Debtor(s)
(required signature block)

CERTIFICATE OF SERVICE

(See "Certificate of Service - Generic" on the Court's website under "Forms/Local/Motions & Related Notices-Certificates of Service-Orders/Certificates of Service/Generic.")