

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO

In re:

Case No.

Debtor(s).

MOTION TO AVOID (CREDITOR'S) LIEN ON HOUSEHOLD GOODS

The debtor, by counsel, asks the Court to avoid a lien on the debtor's personal property pursuant to 11 U.S.C. § 522(f) and states:

1. This Chapter 7 case was filed on _____, 20__ .
2. On or about _____, 20__, debtor borrowed about \$ _____ from
(*creditor*).
3. As security for the debt debtor granted creditor a security interest in the following personal property held primarily for the personal, family, or household use of the debtor or the debtor's dependents (the "household goods"), all of which are now in debtor's possession:

[*describe the household goods*]
4. The debtor did not use any part of the borrowed money to buy the household goods.
5. Debtor's interest in the household goods is exempt.
6. Creditor's lien impairs debtor's exemption in the household goods and should be avoided under 11 U.S.C. § 522(f).
7. Concurrence in this motion was sought and not received.

WHEREFORE, debtor asks the Court to avoid creditor's lien on the household goods.

Signature

Name: _____

Address: _____

Telephone: _____

Email: _____

I certify that on _____, 20__, I served this motion by first class mail, postage prepaid, on:

[insert names, titles, addresses]

And electronically on:

[list]

Signature