

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF ALABAMA

IN RE: \_\_\_\_\_, )  
 )  
 ) Case No. \_\_\_\_\_  
 )  
 Debtor(s). )

COMBINED MOTION TO AVOID NONPOSSESSORY, NONPURCHASE-MONEY  
SECURITY INTEREST, MOTION TO VALUE REMAINING COLLATERAL,  
AND OBJECTION TO CLAIM

Motion to Avoid Security Interest

Debtor(s) move the court, pursuant to Bankruptcy Code § 522(f), to avoid the nonpossessory, nonpurchase-money security interest of \_\_\_\_\_ (“the Lienholder”) in the following items because the Lienholder’s security interest impairs an exemption to which the debtor(s) would otherwise be entitled:

- Household furnishings, wearing apparel, appliances, books, animals, crops, musical instruments, and jewelry held primarily for the personal, family, or household use of debtor(s) or a dependent of debtor(s). Description: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- Personal effects of debtor and dependents (including toys and hobby equipment of minor dependent children). Description: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- 1 television. Description: \_\_\_\_\_
- 1 personal computer and related equipment. Description: \_\_\_\_\_  
\_\_\_\_\_
- 1 VCR or DVD player. Description: \_\_\_\_\_
- Implements, professional books, or tools used by debtor(s) or dependents in their trade. Description: \_\_\_\_\_

- Clothing. Description: \_\_\_\_\_
- Furniture. Description: \_\_\_\_\_
- 1 radio. Description: \_\_\_\_\_
- Linens, china, crockery, and kitchenware. Description: \_\_\_\_\_  
\_\_\_\_\_
- Educational materials and educational equipment for minor dependent children.  
Description: \_\_\_\_\_
- Medical equipment and supplies. Description: \_\_\_\_\_
- Professionally prescribed health aids for debtor(s) or a dependent of debtor(s).  
Description: \_\_\_\_\_
- Other. Description: \_\_\_\_\_

Motion for Valuation

Debtor(s) move the court, pursuant to Bankruptcy Code § 506(a) and Bankruptcy Rule 3012, to determine the value of the Lienholder's claim on any personal property of Debtor(s) as to which its lien has not been avoided.

Objection to Lienholder's Claim

Debtor(s) object to Lienholder's claim no. \_\_\_\_ to the extent that the secured portion exceeds the value of its collateral as determined by the court. The claim should be reclassified as secured only to the extent of that value with the remainder of the claim treated as unsecured.

\_\_\_\_\_  
Attorney for Debtor(s)

Certificate of Service

I certify that I have served this pleading on all entities listed on the matrix by first-class mail and on the Lienholder by first-class mail at the following notice address as listed on its proof of claim: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_