

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
[1] DIVISION

IN RE: :
: :
[2 Name of Debtor(s)], : Chapter ____ Case No. _____-JRS
: :
Debtor(s). :
: :

: :
[3 Name of Moving Party], :
: :
Movant, :
: :
vs. :
: :
[4 Name of Debtor(s)]; and :
[5 Name of Trustee], :
: :
Respondents. :

MOTION TO AVOID JUDICIAL LIEN

COMES NOW, [2 Debtor(s) name], and files this Motion to Avoid Judicial Lien and shows the Court as follows:

1.

Debtor(s) commenced the above-styled case by filing a voluntary petition under Chapter [__] of Title 11, United States Code, on [date petition was filed] (the "Petition Date").

2.

Respondent obtained a judgment against the Debtor(s) on or about [date if judgment] in the [name of court], and the amount of the judgment lien on the Petition Date was [\$judgment amount]

3.

Pursuant to 11 U.S.C. §522 and O.C.G.A. 44-13-100, Debtor(s) properly claimed as exempt on Schedule C, including all allowed amendments to Schedule C, the following property:

[Attach Schedule C]

4.

The value of each claimed exemption in the above-listed property is equal to or greater than the value of that property.

WHEREFORE, Debtor(s) is entitled to entry of an Order avoiding Respondent's lien against the exempt property as set forth above.

Respectfully submitted,