

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 NONPOSSESSORY, NONPURCHASE-MONEY LIEN

COMES NOW, [2 Debtor(s) name], and files this Motion to Avoid Nonpossessory, Nonpurchase-Money 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.

On the Petition Date, Respondent had a nonpossessory, nonpurchase-money security interest on an interest of the Debtor in property as set forth in 11 U.S.C. § 522(f)(1)(B) in the amount of [**\$amount of nonpossessory, nonpurchase-money security interest**]

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,