

UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

In re

Case No.:

Chapter:

Debtor(s)

MOTION TO AVOID NON-POSSESSORY,
NON-PURCHASE MONEY SECURITY INTEREST

The Debtor(s) moves the Court, pursuant to 11 U.S.C. Section 522(f), to enter an order avoiding a lien which is a non-possessory, non-purchase money security interest in household goods and furnishings maintained by the Debtors(s) for personal and family use.

The name and address of the creditor holding the non-possessory, non-purchase money security interest are listed below:

(Name) _____
(Address) _____
(City, State, Zip) _____

The Debtor(s) further represents that the security interest held by the above-named creditor impairs an exemption to which the Debtor(s) would be entitled under West Virginia Code Section 38-10-4. The property subject to the creditor's non-possessory, non-purchase money security interest is property of the type described under 11 U.S.C. Section 522(f) and is listed below:

The lien attached after the _____ day of _____, 20 ____.

Wherefore, the Debtor(s) moves the Court for an order determining the non-possessory, non-purchase money security interest to be null and void, and for such other and further relief as is just.

Dated:

Name(s) of Debtor(s) (printed)

Counsel for Debtor(s) (printed)

Signature