

IN THE United States BANKRUPTCY COURT
FOR THE _____ DISTRICT OF _____ AT _____

In re:)
)
)
)
)
Debtors.)
_____)

No.
Chapter 7

MOTION TO REDEEM PROPERTY
AS EXEMPT

1. Debtors filed a petition for relief under Chapter 7 of the Bankruptcy Code on _____.
2. At the time of filing, debtors claimed as exempt/abandoned personal property their _____ (hereafter "car", in which collateral, _____ is a secured creditor. At the time of filing, debtors owed to _____ approximately \$ _____.
3. The debtors use their car primarily for personal, family and household use, and it was claimed as exempt property pursuant to 11 USC § 522.
4. The Trustee has issued his report of no-asset case on _____
5. At the time of filing, the car was in good condition, with approximately _____ miles. Upon further estimation, it is believed that the fair market value of the car at the time of filing was

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\$ _____, as reflected by the Kelley Blue Book trade in value, a copy of which is attached hereto and incorporated by reference herein.

6. By way of post-petition qualification for a loan (which loan is also conditioned upon court Approval of this motion and entry of the discharge order), Debtors are in a position to redeem their Car, for cash, from _____, pursuant to 11 USC § 722.

Wherefore, debtors respectfully request that they be allowed to redeem their car from _____, by paying the sum of \$ _____ within 30 days of the entry of such an order, or within 30 days of the entry of discharge, whichever occurs later, and that _____, release its secured interest and/or lien, and thrsnfer title to the car, free and clear, to: Fresh Start Loan Corporation, debtors post-petition lender, within 10 days of receipt of said funds and a conformed copy of the order herein.

Dates this _____ day of _____, 20__.

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