

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

In re:

**NAME OF DEBTOR(S)**

Case No. **XX-XXXXX-XXX**

**DEBTOR.**

**Chapter 13**

**OBJECTION TO SECURED CLAIM(S)**

The Debtor(s), by and through counsel, object(s) to the following pre-petition secured claim(s) and moves the Court to determine the treatment of the following collateral for the purposes of plan confirmation:

CREDITOR:

**NAME**  
**STREET ADDRESS**  
**STATE/ZIP**

Description of Collateral: **PMSI VEHICLE**

Alleged Amount Owed: **\$0.00**

Value: **\$0.00**

Treatment: Pay the alleged amount owed of **\$0.00** plus **\_\_\_**% interest over the life of the Chapter 13 plan; or, in the event a timely filed and/or allowed Proof of Claim is filed by or on behalf of this creditor evidencing a purchase-money security interest and that the vehicle loan was acquired **less than 910 days before** the petition filing, pay the amount owed as set forth in such claim plus **\_\_\_**% interest over the life of the Chapter 13 plan; or, in the event a timely filed and/or allowed Proof of Claim is filed by or on behalf of this creditor evidencing a purchase-money security interest and that the vehicle loan was acquired **more than 910 days** before the petition filing, then pay the value of **\$0.00** plus **\_\_\_**% interest over the life of the plan **unless** the amount owed as set forth in such claim is less than the value of **\$0.00**.

Debtor(s) pray(s) that in the event a timely filed and/or allowed Proof of Claim is filed by or on behalf of any of the abovementioned creditors evidencing an **unsecured interest**, that said creditor be paid the same percentage distribution as all other unsecured creditors through the Chapter 13 plan and further pray(s) that either upon payment of the underlying debts determined

under non-bankruptcy law or a discharge under Bankruptcy Code § 1328, all liens be cancelled and any and all title documents be promptly delivered to Debtor(s).

**DATED:** \_\_\_\_\_

Respectfully submitted,

/s/ ATTORNEY FOR DEBTOR(S)

CERTIFICATE OF SERVICE

On \_\_\_\_\_ [date], a copy of this pleading was served on each person/entity listed above by United States Mail and to the following parties via Notice of Electronic Filing NEF through the ECF system:

[List parties served via ECF system]

\_\_\_\_\_  
(Signature)

Attorney name and bar no.

Address

Telephone no.

Email address