

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION AT GARY

2000 067142

IN RE THE MATTER OF:)

ARCHIE LEE WALKER,)
SSN. 317-52-8323)

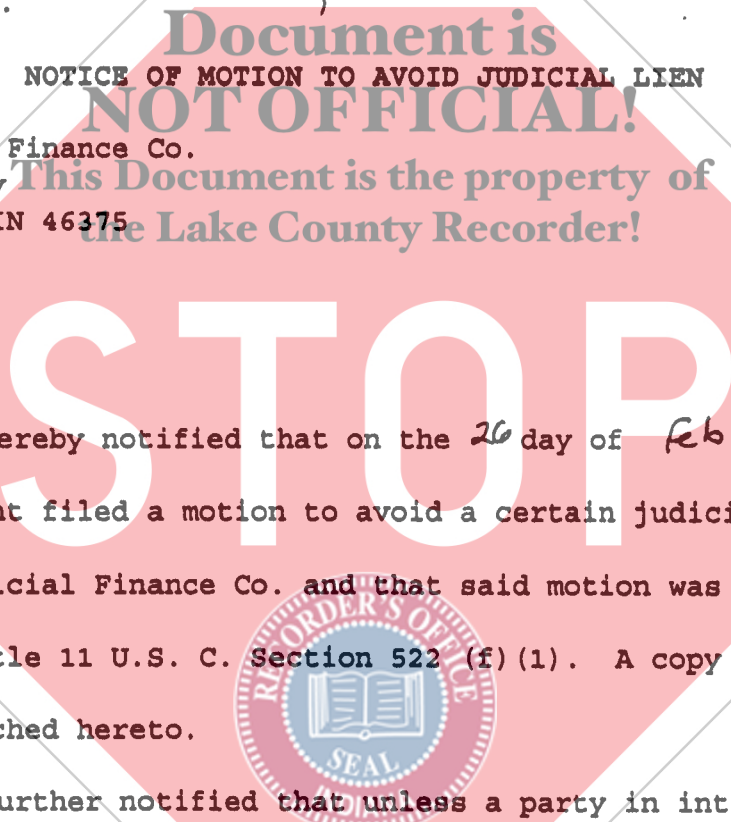
CASE NO. 13)
CHAPTER 96-63203)

Debtor(s).)

NOTICE OF MOTION TO AVOID JUDICIAL LIEN

TO: Beneficial Finance Co.
238 Lincoln Hwy
Scherville, IN 46375
and

%David Baker
4231 Cleveland
Gary, IN 46409



You are hereby notified that on the *26* day of *Feb*, 1997,
debtor/defendant filed a motion to avoid a certain judicial lien in
favor of Beneficial Finance Co. and that said motion was filed
pursuant to Title 11 U.S. C. Section 522 (f) (1). A copy of said
motion is attached hereto.

You are further notified that unless a party in interest files an
objection to said motion on or before the *29* day of
March, 1997, that the Court may avoid the subject lien without
further notice or hearing.

Dated this *26* day of *Feb*, 1997.

Respectfully Submitted,

Brenda J. Rotz

Brenda J. Rotz
Indiana Attorney No. 14333-45
PIERSON & ROTZ
8638 4th Street
Highland, Indiana 46322
(219) 838-2250

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Distribution:

U.S. Bankruptcy Court, 610 Connecticut St., Gary, IN 46402

U.S. Trustee, 100 E. Wayne St. #505, South Bend, IN 46601

Trustee, Paul Chael 401 West 84th Drive, Suite C., Merrillville, IN 46410

Debtor Archie Walker 3851 Tennessee, Gary, IN 46409

Creditor: Beneficial Finance Co., 238 Lincoln Hwy., Schererville, IN 46375

Creditor's Attorney: David Baker, 4231 Cleveland, Gary, IN 46409



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Document is
NOT OFFICIAL!

MOTION TO AVOID JUDICIAL LIEN!

Pursuant to Bankruptcy Rules 4003 (d) and 9014, the Debtor, by
his Attorney, represent as follows:

1. The Creditor, Beneficial Finance Co., has a judicial lien on
the following described property of the Debtor:

Lots 13 and 14, Block 20, in the Great Gary Realty Co's First
Addition to the City of Gary, as per plat thereof, and recorded
in Plat Book 11 page 8, in the Office of the Recorder of Lake
County, Indiana. Commonly known as: 3851 Tennessee Street, Gary,
Indiana. Key number: 43-364-13

Said lien being place on or about the 3rd day of Sept., 1996,
after the effective date of the current Bankruptcy Statute.

2. The lien of said creditor impairs an exemption to which the
Debtor would have been entitled under the laws of the State of Indiana
and the United States, which exemption has been claimed by the Debtor
in the Schedules A & C filed by the Debtor in this case, which
exemption has been allowed.

3. The Debtor are entitled to avoid the judicial lien of the
Creditor, Beneficial Finance Co., in the above described property
under the provision of 11 U.S.C. 522 (f).

WHEREFORE, Debtor ask this Court for an order avoiding the

21.10

judicial lien of said creditor, in the property described in paragraph
1 above.

Respectfully Submitted,

Brenda J. Rotz

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