UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH DAKOTA

In re:	)	Bankr. Case No. 04-10000
	)	Chapter 7
JANE A. ANONYMOUS,	)	
Soc. Sec. No. XXX-XX-6789,[1]	)	DEBTOR'S MOTION TO AVOID LIEN
	)	PURSUANT TO 11 U.S.C. § 522(f)
Debtor.	)	

In support of her motion to avoid lien pursuant to 11 U.S.C. § 522(f), Debtor states that:

(1) Debtor owns the appliances held primarily for the personal, family, or household use of Debtor listed on Exhibit "A" attached hereto, which have a fair market value of $1,000.00.

(2) Debtor has claimed the property described in ¶ (1) exempt pursuant to S.D.C.L. § 43-45-4.

(3) Easy Credit Finance Co., Inc. holds a nonpossessory, nonpurchase money security interest in the property described in ¶ 1 to secure Debtor's repayment of the sum of $1,000.[2]

(4) No other creditor holds a lien against the property described in ¶ 1.[3]

(5) The lien described in ¶ 3 impairs Debtor's claimed exemption:

Value of Debtor's interest:	- $1,000.00
Amount of lien to be avoided:[2]	- $1,000.00
Amount of all other liens:[3]	- $ 0.00
Debtor's allowed exemption:	- $1,000.00
Impairment:	- $1,000.00

WHEREFORE, Debtor respectfully requests that the Court enter an order avoiding Easy Credit Co., Inc.'s lien against Debtor's appliances.

Dated: May 22, 2004.

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