

MOTION FOR RULE 4001 ABANDONMENT

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU.

IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. THE COURT WILL CONDUCT A HEARING ON THIS MOTION ON [DATE] AT [TIME] IN COURTROOM [ADDRESS]. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

CONTEMPORANEOUSLY WITH THE FILING OF THIS MOTION, DEBTOR(S) HAS FILED A MOTION FOR EXPEDITED CONSIDERATION, THEREFORE, THE TIME FOR RESPONDING TO THIS MATTER MAY BE GREATLY SHORTENED.

Debtor(s) and [name of secured creditor] move for relief from the automatic stay under Fed. R. Bankr. P. 4001(d)(1)(iii). The parties agree that (i) Debtor abandons the collateral described on Exhibit "A" attached hereto and (ii) the automatic stay is terminated as to the secured creditor's rights in the collateral.

Counsel to the Debtor

Counsel to the Secured Creditor

SO ORDERED:

ReservedForJudgeSignature