

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
\_\_\_\_\_ DIVISION

In re:

[Debtor(s)' Names],

Debtor(s).

§  
§  
§  
§  
§

Case No. \_\_\_\_\_  
(Chapter 13)

**MOTION TO ENFORCE LIEN**

1. This Motion is filed by the Debtor(s) pursuant to Bankruptcy Local Rule 6007-2(i).

2. On \_\_\_\_\_, the Court confirmed a plan allowing for the surrender of personal property the "Property". The Property is described as \_\_\_\_\_ . The Property was surrendered (check one):

\_\_\_\_\_ Pursuant paragraph 7 of the Plan.

\_\_\_\_\_ Pursuant to a Notice of Surrender under paragraph 20 of the Plan.

3. Notice of the confirmed plan was sent to the holder(s) of claims that are secured by security interests in the Property. The notice was sent on [date]. Attached as Exhibit "A" is a copy of the notice.

4. The surrendered property has not been retrieved.

5. Pursuant to Bankruptcy Local Rule 6007-2(i), the Debtor(s) hold a storage lien against the Property equal to 0.5% of the fair market value of the Property for every day that the Property was held beyond 28 days from the surrender of the Property. More than 228 days have passed since the (i) confirmation of the plan; or (ii) the filing of a Notice of Surrender under paragraph 20 of the plan, as applicable. As a consequence, the Debtor(s) hold a storage lien that exceeds the fair market value of the collateral.

6. The Debtor(s) request entry of an order foreclosing on the storage lien and giving the Debtor(s) unencumbered title to the Property.

Signed: \_\_\_\_\_

[SIGNATURE BLOCK]