

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF VERMONT**

In re:

[Enter Debtor(s) Name(s) Here],
Debtor(s).

Chapter ____
Case # _____

**MOTION TO STRIP WHOLLY UNSECURED LIEN OR MORTGAGE OF [CREDITOR]
PURSUANT TO 11 U.S.C. § 506(a) AND VT. LBR 3013-1**

NOW COMES [name of Debtor] by and through his/her attorney, [name of attorney], pursuant to 11 U.S.C. § 506(a), Federal Rule of Bankruptcy Procedure 9014, and Vt. LBR 3013-1, and requests that this Court enter an order stripping the [lien or mortgage] held by [name of Creditor] on [description of property] (the "Property") and declaring that creditor's claim to be wholly unsecured. In support of this Motion, the Debtor attaches a copy of the [lien or mortgage], and states the following.

1. This Court has jurisdiction in this matter pursuant to 28 U.S.C. § 1334(a). This matter is a core proceeding as provided by 28 U.S.C. § 157(b)(2)(K).
2. The Debtor filed a voluntary petition under Chapter ____ of the Bankruptcy Code on [date].
3. The Property has a fair market value of \$ _____. This valuation is based upon [describe basis for valuation (e.g., grand list, real estate appraisal)].
4. The Property is subject to the following liens of record:

Type of lien	Holder of lien (including name and address)	Date lien originated/arose	Recording reference (town, book, page and date)	Original amount of lien	Outstanding balance of lien
	[this Creditor]				

5. There is no equity to which the [lien or mortgage] held by [name of Creditor] can attach.

WHEREFORE, the Debtor respectfully requests that this Court enter an order declaring the [lien or mortgage] held by [name of Creditor] on the Property in the amount of \$ _____ to be void, and (b) declaring the Creditor's claim to be wholly unsecured, unless the case is dismissed.

Respectfully submitted,
[name of Debtor]

Dated at *[location]* this *[day]* of *[month]*, *[year]*.

By: _____
(signature of movant/attorney)
*[Provide name, address, e-mail address,
phone number, and fax number, if any, of
movant/attorney]*