

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In Re: Pia Ameshia Landrum,

BKY 04-35000

Debtor.

Chapter 13

RESPONSE TO OBJECTION OF DAIMLERCHRYSLER

DaimlerChrysler Services North America (“DCS”) has objected to Confirmation of the Debtor’s Chapter 13 Plan. At issue is the Debtor’s cramdown of DCS’s secured claim to an interest rate of 6%. The contract rate of interest is 19.75%. The vehicle is a 2001 Daewoo Leganza.

DCS claims the reasonable value of the vehicle is \$9,822.33, which is the balance due on the contract. Pursuant to NADA schedules (attached), the Leganza is worth \$6,925.00. The Debtor should not have to pay more than the NADA retail value of the car resulting in a windfall to DCS.

The Debtor filed this Chapter 13 case in good faith. The Leganza is necessary to an effective reorganization as it is Debtor’s sole means of transportation to work.

WHEREFORE, the debtor respectfully requests the court confirm her proposed Chapter 13 Plan.

CURTIS K. WALKER LAW FIRM

Dated: October 7, 2004

By: _____/e/_____
Curtis K. Walker #113906
Thayer A.K. Butler # 200815
Mary C. Hoben #0335411
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Minneapolis, MN 55409
(612) 824-4357

UNITED STATES BANKRUPTCY COURT
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In re: Pia Ameshia Landrum, BKY 04-35000
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UNSWORN DECLARATION FOR PROOF OF SERVICE

I, Thayer A.K. Butler, declare under penalty of perjury, that on October 8, 2004, I faxed and mailed copies of the foregoing Response to DaimlerChrysler's Objection to Confirmation of Chapter 13 Plan by facsimile and by first class mail, postage prepaid, to each entity named below at the address stated for each entity:

Jasmine Z. Keller, Chapter 13 Trustee
12 South 6th Street, Suite 310
Minneapolis, MN 55402
Fax 612-338-4529

U.S. Trustee's Office
1015 US Courthouse
300 S. Fourth Street
Minneapolis, MN 55415
Fax 612-664-5516

Marilyn J. Washburn, Attorney for DaimlerChrysler
Riezman Berger P.C.
7700 Bonhomme, 7th Floor
St. Louis, MO 63105
Fax 314-727-6458 and 314-727-1086

Executed on : 10-8-2004 Thayer A.K. Butler

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UNSWORN DECLARATION FOR PROOF OF SERVICE

I, Thayer A.K. Butler, declare under penalty of perjury, that on October 8, 2004, I faxed and mailed copies of the foregoing NADA Attachment to Debtor's Response to DaimlerChrysler's Objection to Confirmation of Chapter 13 Plan by facsimile and by first class mail, postage prepaid, to each entity named below at the address stated for each entity:

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