

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In the Matter of:

NAME OF DEBTORS,

CASE NO. 20__-____- initials of judge
(RAE/JES/MDM)

Debtors.

CHAPTER 13

DEBTORS' OBJECTION TO PROOF OF CLAIM NO. ____
FILED BY [CREDITOR'S NAME]
[SECURED CLAIM SATISFIED THROUGH SURRENDER OF COLLATERAL]

The above-named debtors, by their attorneys, [firm name], hereby object to the proof of claim number ____ filed by [creditor's name] in this bankruptcy matter on the following grounds:

1. The creditor filed a secured claim in the amount of \$_____, with a fair market value of \$_____, and an unsecured claim in the amount of \$_____.

2. The debtors' plan, filed on _____, and confirmed on _____, provided that the creditor's secured claim would be satisfied through the surrender of the collateral, more specifically described as [insert date, year, vehicle identification or description, property address, etc.].

3. [The debtors have surrendered the collateral to the creditor.] [The debtors have tendered the collateral to the creditor, who has not accepted the tender of the collateral.]

WHEREFORE, the debtors respectfully request that this court enter an order disallowing the creditor's secured claim as filed and allowing it as set forth in this court's order confirming the debtor's Chapter 13 plan.

Dated at Milwaukee, Wisconsin [Insert Date]

Name
Title
Address
Telephone Number