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RCPT # \_\_\_\_\_

RICHARD J. HAYDEN  
RICHARD J. HAYDEN, P.S.  
1427 W. Sixth Avenue  
Spokane, WA 99204-3303  
(509) 624-1111

U.S. COURTS

ON JUN 25 PM 2:19

Attorney for FORD MOTOR CREDIT COMPANY

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF IDAHO, BOISE

REC'D  
CAMELON S. DUCKE,  
CLERK, IDAHO

In re:

CHAPTER 13

KATHERINE L. YOCOM,

NO. 04-1883

Debtor.

NOTICE OF MOTIONS FOR RELIEF  
OF STAY PURSUANT TO TITLE 11 U.S.C.  
§ 362(d)(1),(2); FRBP 4001 LBR 4001;  
ADEQUATE PROTECTION PURSUANT TO  
§§ 363(e); 361(1); ABANDONMENT UNDER  
§ 554; CO-DEBTOR UNDER § 1301; AND  
WAIVER UNDER FRBP 4001

TO: DEBTOR; C. GRANT KING, YOUR ATTORNEY; ALL PARTIES IN INTEREST:

PLEASE TAKE NOTICE THAT FORD MOTOR CREDIT COMPANY ("FMCC"), has moved the court for an order allowing relief of the automatic stay, pursuant to Title 11 U.S.C. § 362(d)(1) and (2) and abandonment, and, alternatively, adequate protection.

The grounds for the motion are 11 U.S.C. §§ 362(d)(1) and (2); Title 11 U.S.C. §§ 363(e), 361(1); 506(a), 554(a), 1301, and LBR 4001, pursuant to LBR 4001 FMCC specifically alleges that:

1. It is the holder of a perfected security interest in a 1992 FORD F150 TRUCK, VIN # 1FTEX14N1NKA64007;
2. The moving party is entitled to relief for cause for lack of payment; the collateral of the moving party is not necessary to an effective reorganization; the debtor is \$907.11 delinquent at state law.
3. The value of this collateral varies, but the relevant trade book shows a value of \$5,275.00. The debtor owes \$5,996.20.

PLEASE TAKE FURTHER NOTICE that the moving party will also ask the court to provide otherwise and make its order effective upon filing pursuant to FRBP 4001 to allow immediate enforcement. The ten-day stay of 4001 shall be deemed waived.

SHOULD YOU OBJECT TO THIS MOTION FOR RELIEF or any other relief sought, you must comply with FRBP 4001 and 4001.2 and be prepared to make the appropriate representations to the Bankruptcy Court at hearing at the U.S. COURTROOM, UNITED STATES BANKRUPTCY COURT, FEDERAL BLDG., 5<sup>TH</sup> FLOOR, 550 W. FORT STREET, BOISE, ID 83724; and object by

NOTICE OF MOTION FOR RELIEF FROM STAY

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Facsimile (509) 456-8654  
A Professional Service Corporation

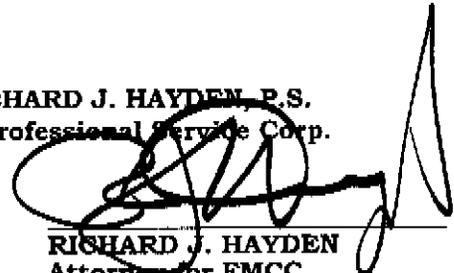
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*filing an objection, in writing, with the specific grounds for your objection, and request for hearing with the CLERK OF THE U.S. BANKRUPTCY COURT, 550 W. FORT, MSC 042, FEDERAL BUILDING, BOISE, ID 83724, and serve a copy of your objection on the movant and upon all parties receiving service of the motion no later than 20 days from the date of this notice. You must also obtain a hearing date and time you will appear and provide written notice of the hearing time set to the movant at the address below.*

SHOULD YOU FAIL TO OBJECT within the time set forth above, your objection will be deemed waived, and the above relief requested may be granted without further notice to you.

DATED this 22nd day of June, 2004.

RICHARD J. HAYDEN, P.S.  
A Professional Service Corp.

By: 

RICHARD J. HAYDEN  
Attorney for FMCC  
For the Firm

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**CERTIFICATE OF MAILING**

I HEREBY CERTIFY under penalty of perjury that on the 21<sup>st</sup> day of June, 2004, I mailed a true and correct copy of the NOTICE OF MOTION FOR RELIEF FROM STAY upon C. GRANT KING, 5400 FRANKLIN RD #J, BOISE, ID 83705; KATHERINE L. YOCOM, 2040 W. SLATON DR., MERIDIAN, ID 83642, MICHAEL YOCOM (LAST KNOWN ADDRESS), 1726 BROOKLAWN DR., BOISE, ID 83709, JOHN H. KROMMENHOEK, CHAPTER 13 TRUSTEE, P.O. BOX 8358, BOISE, ID 83707; by depositing the same in the U.S. mail, postage prepaid, addressed to the above-referenced parties.

  
Heidi Claytor

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CERTIFICATE OF MAILING

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