

RICHARD J. HAYDEN  
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1427 Sixth Avenue  
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ISBA # 3481

U.S. COURTS

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Of Attorneys for FORD MOTOR CREDIT COMPANY

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF IDAHO

In re:

FRANK L. CHAPIN aka SYDNEY L.  
GUTIERREZ-CHAPIN aka SYDNEY  
L GUTIERREZ

Debtors.

CHAPTER 11  
NO. 02-20218

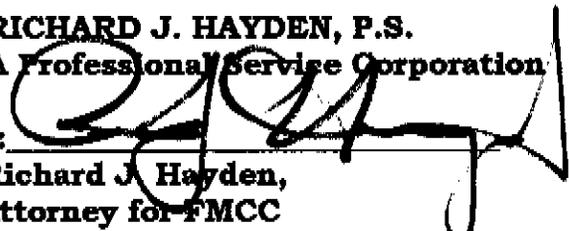
PRESENTATION OF JON  
SCHAEFFER'S DECLARATION

HEARING DATE: JULY 9, 2002  
HEARING TIME: 10:00 AM. MDT  
9:00 AM. PDT  
PLACE COEUR D' ALENE

COMES NOW RICHARD J. HAYDEN and RICHARD J. HAYDEN, P.S., and  
respectfully presents the declaration of Jon Schaeffer in this matter.

DATED this 27<sup>th</sup> day of June, 2002.

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

By:   
Richard J. Hayden,  
Attorney for FMCC

DECLARATION OF  
JON SCHAEFFER  
IN SUPPORT OF RELIEF

ORIGINAL

RICHARD J. HAYDEN P.S.  
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**Attorney for FORD MOTOR CREDIT COMPANY**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF IDAHO**

**In re:  
FRANK L. CHAPIN aka SYDNEY L.  
GUTIERREZ-CHAPIN aka SYDNEY L  
GUTIERREZ  
  
Debtors.**

**Chapter 13**

**NO. 02-20218**

**DECLARATION OF JON  
SCHAEFFER IN SUPPORT OF  
RELIEF**

**HEARING DATE: JULY 9, 2002  
HEARING TIME: 10:00 AM. MDT  
9:00 AM. PDT  
PLACE COEUR D' ALENE**

**COMES NOW, Jon Schaeffer under penalty of perjury pursuant to federal law, and states as follows:**

**My name is Jon Schaeffer, and I am over the age of eighteen (18) and make this declaration based upon personal knowledge.**

**DEFAULT AND COMPETENCY. I am a bankruptcy manager in charge of the debtor's file with FORD MOTOR CREDIT COMPANY. I am employed by FORD MOTOR CREDIT COMPANY (hereinafter "FMCC"). FMCC has a secured interest in one 2000 FORD PU VIN# 1FTNX21F1YEB97856;**

**1. I am thoroughly familiar with the file and have reviewed the file**

DECLARATION OF  
JON SCHAEFFER  
IN SUPPORT OF RELIEF

**RICHARD J. HAYDEN P.S.  
1427 W. Sixth Avenue  
Spokane, WA 99204-3303  
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before making this declaration. It is my testimony that as of the date of this declaration, the debtors on this contract are 5 months in default in the amount of \$2,685.43 to FMCC from February 15, 2002 to June 15, 2002. The debtor owes a total net amount of \$24,643.50 plus fees and costs, to FMCC.

2. CURE. As of the date the motion was filed, there has been no full cure of the arrearage.

3. VALUE OF COLLATERAL. I assert that, based upon the value of the collateral and the fact that certain mobile collateral declines over time and can decline quite precipitously, FMCC believes that it is not adequately protected. The collateral is depreciating. The current value that is arrived at is \$22,875.00.

4. EQUITY. The debtor is believed to have no equity in the collateral.

5. INSURANCE. FMCC has no proof in its file of current Casualty insurance on the vehicle. Our Attorney's Office requested the same on June 21, 2002.

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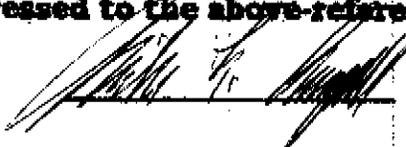
I declare, under penalty of perjury pursuant to federal law, that the above is true and correct, to my personal knowledge and belief.

DATED this 25<sup>th</sup> day of June, 2002.

  
Jon Schaeffer

**CERTIFICATE OF MAILING**

I HEREBY CERTIFY under penalty of perjury that on the 28<sup>th</sup> day of June, 2002, I mailed a true and correct copy of the foregoing Declaration of Jon Schaeffer upon Bruce A. Anderson, PO Box 1049, Sandpoint, ID 83854, Lloyd Wilson, 1519 W. Broadway, Spokane, WA 99201 and United States Trustee, Chapter 11, PO Box 110, Boise, ID 83701 by depositing the same in the U.S. mail, postage prepaid, addressed to the above-referenced parties.

  
MIKE CAMPBELL PARALEGAL

DECLARATION OF  
JON SCHAEFFER  
IN SUPPORT OF RELIEF

RICHARD J. HAYDEN P.S.

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