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U.S. COURTS  
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REC'D. FILED  
CAMERON S. BURKE  
CLERK IDAHO

Attorney for Debtors

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF IDAHO

In re: )  
 ) Case No. 96-02095  
HIPWELL, TERRY, )  
 ) OBJECTION TO MOTION TO LIFT  
Debtor. ) AUTOMATIC STAY  
 )

COMES NOW Terry Hipwell, Debtor, and in response to the motion for relief from the automatic stay presents as follows:

1) That coincidentally with the filing of John Deere's filing of the motion to lift stay the Debtor has filed a Motion to surrender certain items of collateral to John Deere Company and with the surrender of the same, deducted from the indebtedness owed to the creditor of \$156,000 as reflected in the schedules of the Debtor. The balance of the Debtor will be \$67,000. The value of the remaining farm equipment collateral is equal to \$81,000 and therefore, John Deere is adequately protected.

In the event the court finds that John Deere is not adequately

protected then the Debtor will provide adequate protection in the form of additional security upon the real property of other farm equipment so as to adequately protect the creditor.

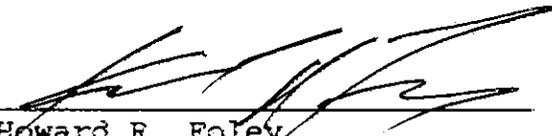
DATED this 15<sup>th</sup> day of November, 1996.

  
Howard R. Foley

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15<sup>th</sup> day of October, 1996, I caused to be served a true and correct copy of the foregoing Objection to Claims by the method indicated below, and addressed to the following:

Office of the U.S. Trustee	<input checked="" type="checkbox"/>	Mailed
P.O. Box 32	<input type="checkbox"/>	FAXED
Boise, ID 83707	<input type="checkbox"/>	Hand-delivered
United States Trustee	<input checked="" type="checkbox"/>	Mailed
Ronald D. Schoen	<input type="checkbox"/>	FAXED
P.O. Box 216	<input type="checkbox"/>	Hand-Delivered
Payette, ID 83661		
Les Bock	<input checked="" type="checkbox"/>	Mailed
Dillion, Bosch, Daw & Bock	<input type="checkbox"/>	FAXED
242 N. 8th Street, Suite 200	<input type="checkbox"/>	Hand-delivered
Boise, ID 83702		

  
Howard R. Foley