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ISB # 2106

Counsel for Wilson-Bates

**IN THE UNITED STATE BANKRUPTCY COURT**  
**FOR THE DISTRICT OF IDAHO**

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|                                    |   |                              |
|------------------------------------|---|------------------------------|
| <b>In Re:</b>                      | ) |                              |
|                                    | ) |                              |
| <b>CLINTON PATRICK HINTON, and</b> | ) | <b>CASE NO. 99-41638</b>     |
| <b>HOLLY KAY HINTON</b>            | ) |                              |
|                                    | ) | <b>OBJECTION TO DEBTORS'</b> |
| <b>Debtor.</b>                     | ) | <b>CHAPTER 13 PLAN OF</b>    |
|                                    | ) | <b>REORGANIZATION</b>        |

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COMES NOW, Wilson-Bates Appliance Stores, Inc., a secured creditor of the above estate, by and through its counsel, Richard D. Greenwood, and objects to Debtor's Chapter 13 Plan as follows:

1. Debtors' Plan incorrectly states the amount of Creditor Wilson-Bates secured claim. Specifically, the Debtors' Plan shows the secured value of Wilson-Bates in the amount of \$1,500. Creditor Wilson-Bates Appliance Stores, Inc. holds an allowed secured claim in the amount of \$2,201.20.
2. Debtors' Plan does not provide for payment to this creditor the allowed amount of this secured creditor's claim. This creditor's collateral has a value equal to the outstanding unpaid cash balance of \$2,201.20.
3. Debtors have failed to include all of the indebtedness owed to Wilson-Bates Appliance Stores, Inc. Specifically, in addition to the television set forth in Debtors' Plan, Debtors are also indebted to Wilson-Bates for the purchase of a Great American Oak audio/video cabinet,

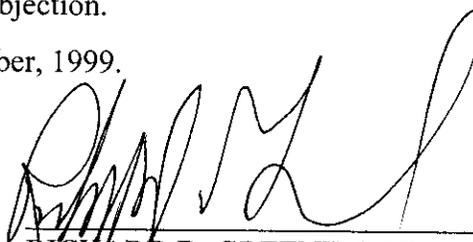
and a Pioneer bookshelf with surround sound.

4. Debtors' Chapter 13 Plan provides for an unreasonably low rate of interest given the nature of the debt and the nature of the collateral. This creditor affirmatively alleges that the market rate of interest for such debts, in the absence of bankruptcy, varies from 18% to 21%. Given that this creditor is a fully secured creditor, this creditor is entitled to the contract rate of interest which is 18.15%.

WHEREFORE this moving creditor requests confirmation of Debtors' Plan be denied.

A hearing is requested on this Objection.

DATED this 27 day of October, 1999.



RICHARD D. GREENWOOD

Attorney for Wilson-Bates Appliance Stores, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 27 day of October, 1999, I caused a true and correct copy of the foregoing instrument, to be forwarded as follows to the following:

Darren J. Guthrie  
Attorney at Law  
P. O. Box 86  
Jerome, Idaho 83338

U.S. Mail postage prepaid  
 Hand Delivered  
 By Facsimile

U.S. Trustee  
P.O. Box 110  
Bosie, Idaho 83701

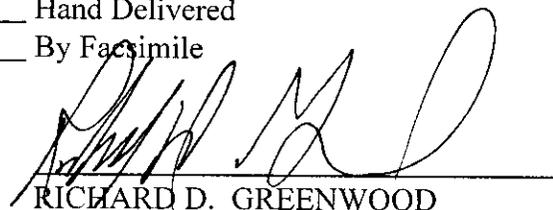
U.S. Mail postage prepaid  
 Hand Delivered  
 By Facsimile

L.D. Fitzgerald  
Trustee  
P. O. Box 6199  
Pocatello, Idaho 83205

U.S. Mail postage prepaid  
 Hand Delivered  
 By Facsimile

Clinton and Holly Hinton  
1006 4th Avenue E.  
Jerome, Idaho 83338

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 Hand Delivered  
 By Facsimile



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