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Attorney for Debtors

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF IDAHO

In Re:)
KNIGHT, FRANK & MONICA,)
Debtors.)

Bkr. Case No. 00-00244
Chapter 13

**MOTION FOR EARLY PAYOFF
AND NOTICE**

COME NOW the Debtors, Frank and Monica Knight, by and through their counsel of record, Randal J. French of the firm of Bauer & French, and moves this Court for an order allowing the Debtors to pay the balance of their chapter 13 payments in full at this time, and obtain the entry of a discharge on their chapter 13. Debtors are negotiating a loan to pay off this chapter 13 at this time. The balance to pay this chapter 13 plan in full, according to the trustee's office, is \$18,776 as of November 19, 2002.

Creditors will not be prejudiced and in fact will be benefitted, in that they will receive in a lump sum all payments that they were to receive under the chapter 13 plan. Unsecured creditors may be further benefitted in that secured creditors will receive less interest because the plan is paid in full at this time. No creditor would be prejudiced by the granting of this motion.

Debtors have also moved to modify their chapter 13 plan to allow for payment of \$1,479 in attorney fees, pursuant to the Application for Approval of Compensation filed herewith, as an administrative priority expense, pursuant to 11 U.S.C. Section 1329(a), 11 U.S.C. Section 1322(a)(2), 11 U.S.C. Section 507(a)(1), and Section 503(b)(1)(A). Debtors propose to provide

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1 that all fees approved by the Court shall be paid from the \$18,776 paid to the trustee, as an
2 administrative priority expense, with priority over unsecured priority claims identified in 11
3 U.S.C. Section 507(a)(2)-(9).

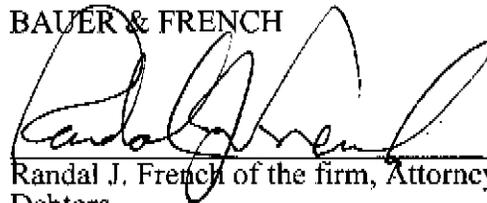
4 Wherefore, the Debtors request that this Court enter an order allowing them to pay off
5 the balance of their chapter 13 and obtain the entry of an order discharging them from liability
6 pursuant to 11 U.S.C. Section 1328(a).

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8 **NOTICE OF HEARING**

9 Notice is hereby given that on **Monday the 16th day of December, 2002**, in the
10 courtroom of the above-entitled Court at 550 West Fort Street, 5th Floor, Boise, Idaho, at the
11 hour of **1:30 p.m.**, or as soon thereafter as counsel can be heard, the above motion will be
12 heard.

13 RESPECTFULLY submitted this 16th day of November, 2002.

14 BAUER & FRENCH

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17 Randal J. French of the firm, Attorney for
18 Debtors