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CLERK OF DISTRICT COURT
BOISE, IDAHO

Attorney for Creditor / First Security Bank, N.A.
Our File No. 09-33543

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF IDAHO

IN RE:)	
)	Chapter 13
VLADIMIR PANIOUCHKINE,)	
TATYANA PANIOUCHKINE,)	Case No. 99-41879
)	
)	OBJECTION TO CHAPTER 13 PLAN
)	AND RELATED MOTIONS
Debtor(s).)	
_____)	

COMES NOW First Security Bank, N.A., by and through its attorney of record, Michael L. Schindele, herewith objects to the Chapter 13 Plan And Related Motions upon the grounds and for the reasons that the plan is proposed in bad faith (see insurance proceeds below) and proof of loss-payee coverage as to any of its collateral, that the rate of interest in the plan is a cramdown from the Idaho bar's customary 9%, that the leased unit aside, the plan only addresses First Security Bank, N.A.'s Lincoln and 1993 International at unacceptable values when the plan should contain the following regarding First Security Bank, N.A.'s secured loans:

-- No mention of one 1994 Dodge pickup 3500 or its insurance proceeds; At time of filing value was \$13,075.00. Balance on loan \$4,694.32;

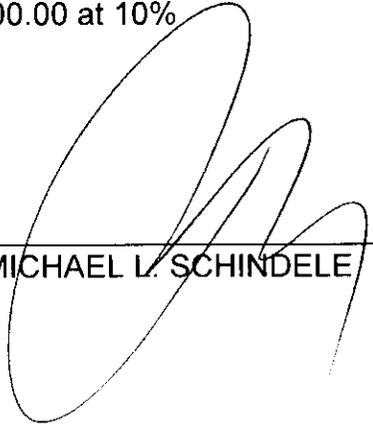
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-- No mention of one 1997 Mazda Protege or its insurance proceeds; Value was \$13,545.00. Balance on loan \$16,702.00;

-- 1998 Lincoln Navigator's allowed secured value should be \$35,400.00 at 10%, but more importantly, it should not be in the plan; It is not necessary for the effective reorganization of the plan; The debtor could use the sums of the \$800.00 per month regarding this unit to buy a smaller, less expensive vehicle; Moreover, the Courts normally would not allow this type of vehicle to be reaffirmed in a Chapter 7, so why should a debtor be able to keep it in a 13 unless it was necessary for the effective reorganization of a plan; Finally, it sends the wrong message to the community when they see a recent bankrupt driving around a 1998 Lincoln Navigator following bankruptcy; and

-- 1993 IHC Semi-Truck - N.A.D.A. is \$10,000.00 at 10%

DATED this 31st day of January, 2000.



MICHAEL L. SCHINDELE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 31st day of January, 2000, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Vladimir Paniouchkine
Tatyana Paniouchkine
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MICHAEL L. SCHINDELE