

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**IN RE:  
CHRISTINA A. MORENO**

**CASE NO: 13-51775 G**

**Debtor**

**TRUSTEE'S OBJECTION TO Motion for Adequate Protection  
AND REQUEST FOR HEARING**

**TO THE HONORABLE JUDGE OF SAID COURT:**

**Now comes, Mary K. Viegelahn, Chapter 13 Trustee and files this, her Chapter 13 Trustee's Objection to the above-referenced Motion.**

**The Chapter 13 Trustee does not approve the afore- mentioned motion for the following reasons :**

**The Trustee opposes the Motion for adequate protection filed August 6, 2013 by Randolph Brooks Federal Credit Union as it does not contain the documentation necessary to show a perfected security interest in the 2008 Dodge Charger. Additionally, the creditor has not filed a Proof of claim on this debt with the required security documents.**

**WHEREFORE, the Trustee requests the Court deny the motion for the reasons stated above and set it for hearing on the next available hearing date. The Trustee further asks the court for any other relief to which she may be entitled.**

**Dated: August 09, 2013**

**Respectfully submitted,**

**/S/**

**DAVID VAN ZYL  
STAFF ATTORNEY FOR THE CHAPTER 13 TRUSTEE  
909 N.E. Loop 410, Suite 400  
San Antonio, TX 78209**

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

IN RE: CHAPTER 13

**CHRISTINA A. MORENO**

DEBTOR(S) CASE NO.: **13-51775 G**

**CERTIFICATE OF SERVICE**  
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I hereby certify that a copy of the attached document was served on the parties listed below by ordinary U.S. Mail or served electronically through the Court's ECF System at the e-mail address registered with the Court on this **August 12, 2013**.

Debtor(s):

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CHRISTINA A. MORENO  
12210 MADRIGAL  
SAN ANTONIO, TX 78233

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/S/

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DAVID W. VAN ZYL