

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE:	§	
	§	
CHRISTINA ALEXANDRA MORENO	§	CASE NO. 17-52057-rbk
	§	
DEBTOR	§	CHAPTER 13

OBJECTION TO CHAPTER 13 PLAN

Comes now Santander Consumer USA Inc. dba Chrysler Capital ("Santander") a secured creditor in the referenced Bankruptcy Case and files this it's Objection to the Debtor's Chapter 13 Plan and in support thereof would show the following:

I.

Santander is a secured creditor in this case in the amount of \$37,263.39. The Debtor has valued the 2016 DODGE CHARGER VIN: 2C3CDXHG0GH286115 ("Vehicle") in this case at \$21,137.00. Santander objects to the value of \$21,137.00 because the Debtor's Chapter 13 Plan violates 11 USC 1325(a)(9). Pursuant to 11 USC 1325 (a)(9) Santander is entitled to be paid the full amount of its claim since the loan is secured by a vehicle and the loan was incurred within the 910 days proceeding the filing of the bankruptcy case.

WHEREFORE, Santander requests that the confirmation of the plan be denied because the Chapter 13 Plan violates 11 USC 1325(a)(9) and for such other and further relief to which Santander may be entitled.

Respectfully submitted,

HALEY & OLSON, P.C.

By: /s/ Blake Rasner

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CERTIFICATE OF SERVICE

I certify that on November 15, 2017 a true and correct copy of the above and foregoing was served upon the following parties via electronic means as listed on the court's ECF noticing system or by regular first class mail:

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