

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE**

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In re

Case No.

Debtor(s).

Chapter 13

Plaintiff(s),

v.

Adv. Proc. No.

Standing Chapter 13 Trustee,

Defendant.

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**PLAINTIFF/DEBTOR'S COMPLAINT TO COMPEL TURNOVER OF CERTAIN PROPERTY FROM DEFENDANT/STANDING  
CHAPTER 13 TRUSTEE**

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Plaintiff, the above-named chapter 13 debtor(s), alleges and requests as follows:

This is an adversary proceeding brought pursuant to FED. R. BANKR. P. 7001(1) and 11 U.S.C. § 542(a), to recover certain monies currently in the possession of the defendant, the Standing Chapter 13 Trustee.

The Court has jurisdiction under the provisions of 28 U.S.C. §§ 1334(b) and 157(a).

By virtue of 28 U.S.C. § 157(b)(2)(E), this is a core proceeding. See also FED. R. BANKR. P. 7008(a).

Under the particular facts and circumstances and applicable law, it is asserted that the plaintiff is entitled to turnover of the above-described property from the defendant for "use" as contemplated in 11 U.S.C. § 363.

WHEREFORE, the plaintiff respectfully requests that an expedited hearing be held and that an order directing turnover of the above-described property of the estate from the defendant, the Standing Chapter 13 Trustee, be entered.

\_\_\_\_\_  
Signature of Attorney for Plaintiff

\_\_\_\_\_  
City, State, and Zip Code

\_\_\_\_\_  
Street Address

\_\_\_\_\_  
Office Telephone Number

\_\_\_\_\_  
Bar Disciplinary Number

\_\_\_\_\_  
Facsimile Number