

**UNITED STATES BANKRUPTCY COURT FOR
THE WESTERN DISTRICT OF WISCONSIN**

In Re:

In Bankruptcy No:

**ISRAEL MCKINNEY and
JENNIFER MCKINNEY**

Debtors.

Case No: 22-11558

**MOTION TO APPROVE SALE OF VEHICLE AND USE PROCEEDS TO PURCHASE
REPLACEMENT VEHICLE**

Israel and Jennifer McKinney, debtors, by their attorneys PITTMAN & PITTMAN LAW OFFICES, LLC by Greg P. Pittman hereby moves the Court for an Order under Bankruptcy Code §363(f) granting the sale of the vehicle free clear of liens.

1. The Debtors currently own a 2015 Land Rover LR4 (VIN SALAG2V6XFA743592). This vehicle has consistently been in the shop for the last couple of months with issues. The Debtors have spent thousands of dollars in attempts to repair this vehicle.
2. The vehicle is currently at Don's Affordable Auto in Green Bay, WI and they are the shop that has been working on the Land Rover LR4. It has become evident that it is not feasible or reasonable to continue to put significant cash payments into the vehicle for repairs. The Debtors have paid \$5,000.00 in repairs on the car and have further put a \$2,000.00 for a deposit for more work/parts that are necessary to get the car roadworthy.
3. Don's Affordable Auto currently has a 2007 Subaru Impreza (VIN JF1GD61677H511005) for sale and willing to sell to the Debtors in the amount of \$9,290.00. The replacement vehicle is necessary as the Debtors are a total

household size of 6 and the Debtors rely on help from their older dependents to help shuttle their younger dependents to and from school and activities. In addition, the Subaru has much better fuel economy to help reduce the costs of operation.

4. The deal between Don's Affordable Auto and the Debtors has been structured as follows:
 - a. The Debtors will sign the title to Don's Affordable Auto in exchange for the \$7,000.00 that has already been paid towards repairs.
 - b. The \$7,000.00 sale price of the Land Rover LR4 will be applied to the purchase price of the Subaru.
 - c. The Debtors will pay the balance owed of \$2,290.00 to Don's Affordable Auto.
5. The Debtors believe that the proposed sale is in the best interest of the Debtors and the bankruptcy estate because the sale/purchase will help reduce fuel/operating costs and a more reliable vehicle.
6. There is no lien-holder on the title of the Land Rover LR4, however the Internal Revenue Service has an overarching/blanket lien on all assets. Debtors would consent to the Internal Revenue Service being granted a first position lien on the Subaru that is proposed to be purchased.
7. **WHEREFORE**, the Debtors request the Court enter an order approving the sale of the vehicle in the amount of \$7,000.00 and further grant the Debtors request to use those proceeds in the amount of \$7,000.00 to be applied against the purchase price of the 2007 Subaru Impreza.

Dated this 6th day of March, 2023 at La Crosse, Wisconsin.

PITTMAN & PITTMAN LAW OFFICES, LLC

By: s/Greg P. Pittman
Greg P. Pittman
Attorney for Debtors
Attorney No: 1073787
712 Main Street
La Crosse, WI 54601
(608) 784-0841

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NOTICE OF MOTION TO SELL VEHICLE

PLEASE TAKE NOTICE, that the debtors, Israel and Jennifer McKinney, by their attorneys, by PITTMAN & PITTMAN LAW OFFICES, LLC by Greg P. Pittman, have filed a Motion to Approve Sale of vehicle. A copy of said Motion is attached thereto.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to approve said motion, or if you want the Court to consider your views on the motion, then on or before **March 13, 2023**, you or your attorney must file with the Court, in writing, your position in said matter and request a hearing and file your original document with the *United States Bankruptcy Court, 120 N. Henry St., RM 340, Madison, WI 53703* and a copy to *Greg P. Pittman, 712 Main Street, La Crosse, Wisconsin 54601*. If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought by the motion and may enter an order granting that relief.

Dated this 6th day of March, 2023, at La Crosse, Wisconsin.

PITTMAN & PITTMAN LAW OFFICES, LLC

**By: s/Greg P. Pittman
Greg P. Pittman
Attorney No: 1073787
Attorney for Debtors
712 Main Street
La Crosse, WI 54601
(608) 784-0841**

Label Matrix for local noticing

1758-1

Case 1-22-11558-rmb

Western District of Wisconsin www.wiwb.uscour

Sau Claire

Mon Mar 6 17:01:08 CST 2023

Theresa M. Anzivino

U.S. Department of Justice

222 West Washington Avenue

Suite 700

Madison, WI 53703-2775

American Accounts & Advisers

Attn: Bankruptcy

Po Box 250

Cottage Grove, MN 55016-0250

Nathan Baney

DOJ-Tax

Civil Trial Section, Central Region

P.O. Box 7238

Washington, DC 20044-7238

(P)AMERICOLLECT INC

PO BOX 2080

MANITOWOC WI 54221-2080

Bonneville Collections

Po Box 150621

Ogden, UT 84415-0621

Credit Bureau Data Inc

Attn: Bankruptcy

118 State Street Po Box 2288

La Crosse, WI 54602-2288

Credit Collection Services

Attn: Bankruptcy

725 Canton St

Norwood, MA 02062-2679

Department of Treasury - Internal Revenue S

PO Box 7346

Philadelphia, PA 19101-7346

Enhanced Recovery Company

Attn: Bankruptcy

1014 Bayberry Road

Jacksonville, FL 32256-7412

Gundersen Health System

1900 South Ave.

La Crosse, WI 54601-5496

Mark Haring

122 West Washington Ave.

Suite 500

Madison, WI 53703-2758

IRS - Centralized Insolvency Operations

P.O. Box 7346

Philadelphia, PA 19101-7346

(P)US ATTORNEY'S OFFICE WESTERN DISTRICT OF W

ATTN ESA ANZIVINO

222 WEST WASHINGTON AVENUE

SUITE 700

MADISON WI 53703-2775

Sam E. Kaufman

Vande Zande & Kaufman, LLP

408 E. Main Street

PO Box 430

Waupun, WI 53963-0430

Marine Credit Union

Attn: Collections Dept

P.O. Box 309

Malaska, WI 54650-0309

Marine Cu

Attn: Bankruptcy

Po Box 309

Onalaska, WI 54650-0309

Israel R. McKinney

W5441 Innsbruck Rd

West Salem, WI 54669-9316

Jennifer McKinney

129 S. 2nd St. N. #322

West Salem, WI 54601

(P)NATIONAL SERVICE BUREAU

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SUITE 205

BOTHELL WA 98011-8016

Greg P. Pittman

Pittman & Pittman Law Offices, LLC

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La Crosse, WI 54601-4121

SOUTHEASTERN EMERGENCY PHYSICIANS, LLC

c/o Wakefield & Associates, LLC

PO Box 51272

Knoxville, TN 37950-1272

Secretary of Treasury

Treasury Department

1500 Pennsylvania Avenue N.W.

Washington, DC 20220-0001

Securities and Exchange Commission

175 West Jackson Boulevard

Suite 900

Chicago, IL 60604-2908

U.S. Trustee's Office

180 Regent Street, Suite 304

Madison, WI 53715-2635

VISTA RADIOLOGY PC

c/o Wakefield & Associates, LLC

PO Box 51272

Knoxville, TN 37950-1272

(P)WAKEFIELD & ASSOCIATES

PO BOX 51272

KNOXVILLE TN 37950-1272

Wisconsin Department of Revenue

Special Procedures Unit

P.O. Box 8901

Madison, WI 53708-8901

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Americollect, Inc.
PO Box 1566
Manitowoc, WI 54221

Internal Revenue Service
United States Attorney's Office
222 West Washington Avenue, Suite 700
Madison, WI 53703

National Service Bureau, Inc
18912 North Creek Parkway
Suite 205
Bothwell, WA 98011

Lakefield & Associates
Attn: Bankruptcy
1005 Middlebrook Pike
Knoxville, TN 37909

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Wisconsin Dept. of Revenue
Special Procedures Unit - PO Box 8901
Madison, WI 53708-8901

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Bypassed recipients	1
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