

1 Joseph W. Tillson, Esq.
2 State Bar No. 064664 (CA)
3 2264 Lake Tahoe Boulevard, Suite 11
4 South Lake Tahoe, CA 96150
5 (530) 542-8744
6 (530) 542-7061 (Fax)

7 Attorney for Debtor,
8 DONALD WAYNE PALMER

RECEIVED AND FILED
99 JUL 26 AM 7:00

U.S. BANKRUPTCY COURT
PATRICIA GRAY, CLERK

EOD 7-26-99

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IN THE UNITED STATES BANKRUPTCY COURT
IN AND FOR THE DISTRICT OF NEVADA

10 In Re)
11 DONALD WAYNE PALMER,) CASE NO. 99-31014 gwz
12) Chapter 7 Proceeding
13) Date: July 21, 1999
14) Time: 10:00 a.m.
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Debtor.

AGREEMENT AND STIPULATION RE
MOTION TO AVOID LIEN IMPAIRING DEBTOR'S EXEMPTIONS

This Agreement and Stipulation is entered into by and between DONALD WAYNE PALMER, (hereinafter referred to as "debtor"), by and through his attorney JOSEPH W. TILLSON and DOUGLAS COUNTY PARAMEDIC, which assigned its debt to NATIONAL BUSINESS FACTORS, INC, (hereinafter referred to as "creditor") by and through its attorney ROBERT C. HERMAN, who agree as follows:

RECITALS

1. Debtor filed the above-captioned bankruptcy case under Chapter 7 of Title 11 of the United States Code on April 8, 1999, which case is currently pending in the United States Bankruptcy Court for the District of Nevada.

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1 2. On April 12, 1994, a judgment was recorded in favor of
2 Creditor against debtor from a judgment in the First Judicial
3 District Court of the State of Nevada in and for Carson City,
4 Case Number 94-00279A which created a lien on the real property
5 of the debtor described below.

6 3. The real property which the lien impairs is located at
7 3386 Vista Grande, Carson City, County of Douglas, State of
8 Nevada and is more particularly described as follows:

9 Lot 145 of Block B as shown on the plat of Silverado
10 Heights No.2, filed for record in the office of the
11 County Recorder of Douglas County, Nevada, as
12 Document No. 33717, on June 20, 1979.

13 Assessor's Parcel No: 13-261-04

14 4. For the purposes of releasing the liens against the
15 real property, and according to said motion to avoid the
16 judicial lien on the debtor's real property pursuant to 11
17 U.S.C. §522(f), debtor and creditor agree as follows:

18 AGREEMENT AND STIPULATION

19 5. In consideration thereof, creditor hereby releases
20 from its judgment lien that piece of real property commonly
21 known as 3386 Vista Grande, Carson City, County of Douglas,
22 State of Nevada and more particularly described as follows:

23 Lot 145 of Block B as shown on the plat of Silverado
24 Heights No.2, filed for record in the office of the
25 County Recorder of Douglas County, Nevada, as
26 Document No. 33717, on June 20, 1979.

27 Assessor's Parcel No: 13-261-04

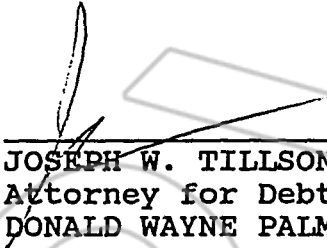
28 6. Creditor, by and through its attorney, shall execute
this stipulation to release said judgment lien, which release
debtor will cause to be recorded.

7. It is further stipulated and agreed that in the

1 future, creditor shall not pursue its judgment lien against the
2 debtor's assets.

3 8. Debtor and creditor shall promptly execute and deliver
4 such additional and further documents, papers, and assurances,
5 and instruments as may be requested by the other party which
6 are reasonably necessary to carry out this Agreement and
7 Stipulation.

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10 Dated: July 19, 1999

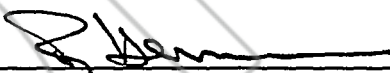


JOSEPH W. TILLSON
Attorney for Debtor,
DONALD WAYNE PALMER

2264 Lake Tahoe Boulevard, Ste 11
South Lake Tahoe, CA 96150
(530) 542-8744
(530) 542-7061 (Fax)

15 APPROVED:

16
17 Dated: July 13, 1999



ROBERT C. HERMAN
Attorney for Creditor
DOUGLAS COUNTY PARAMEDIC, which
assigned its debt to NATIONAL
BUSINESS FACTORS, INC

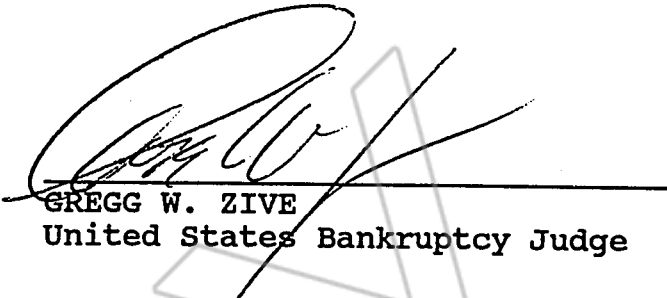
301 West Fourth Street
Carson City, NV 89703

1 ORDER

2 The Court having considered the foregoing Agreement and
3 Stipulation, and good cause appearing, it is hereby,

4 ORDERED, that the Agreement and Stipulation is approved
5 and the parties be, and hereby are, authorized to perform in
6 accordance therewith.

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8 Dated: JUL 26 1998

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GREGG W. ZIVE
United States Bankruptcy Judge

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25 REQUESTED BY
Joseph Tillson
26 IN OFFICIAL RECORDS OF
DOUGLAS CO. NEVADA

27 1999 AUG 24 AM 11: 33

28 LINDA SLATER
RECORDER

\$10⁰⁰ PAID KJ DEPUTY

I certify that this is a true copy:

Attest: 
Deputy Clerk, Bankruptcy Court

SEAL

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