

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

FILED

FEB - 1 2005

U.S. BANKRUPTCY COURT
BY Wm DEPUTY

IN RE:

SAMME JO BRADY

Debtor.

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Case No. 04-14870-FRM
Chapter 7

MOTION TO SUPPLEMENT ORDER COMPELLING ABANDONMENT

The Society of Lloyd's (the "Movant"), a secured creditor and party in interest in the above captioned case, hereby files its Motion to Supplement Order Compelling Abandonment (the "Motion") and in support thereof respectfully represents as follows:

JURISDICTION

1. The Court has jurisdiction over the Motion pursuant to 28 U.S.C. §§ 157 and 1334(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

BACKGROUND

2. The United States District Court for the Southern District of California entered a judgment for the Movant and against Samme Jo Brady (the "Debtor") on June 4, 2003 in the amount of \$1,475,619. An abstract of judgment (the "Abstract") was recorded in the official records of Imperial County, California on June 30, 2003. Pursuant to California law, filing the Abstract gave the Movant a lien on all of the Debtor's real property located in Imperial County, California.

3. The Debtor filed for protection under Chapter 7 of the Bankruptcy Code on September 21, 2004. Ronal Ingalls was appointed Chapter 7 Trustee (the "Trustee"). The Debtor filed schedules on October 13, 2004. In her schedules, the Debtor listed real property

located in Imperial County, California: 600 Broadway, El Centro, CA 92293 Lot 20, Blk 7, Townsite of El Centro, Imperial County (the "California Property").

4. By virtue of filing the Abstract, the Movant has had a valid lien (the "Lien") against the California Property since June 30, 2003.

5. On October 25, 2004, the Movant filed a Motion to Compel Abandonment of Property, in which Lloyd's requested that the Trustee be directed to abandon the California Property pursuant to § 554(b) of the Bankruptcy Code. An Order Granting the Motion to Compel Abandonment (the "Order") was entered on November 15, 2004, and the Trustee was directed to abandon the California Property.

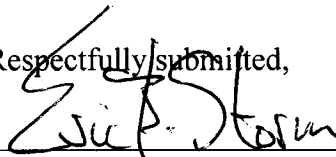
RELIEF REQUESTED

6. Federal Rule of Bankruptcy Procedure 9024 allows a party to seek relief from a judgment or order so long as relief is sought within a reasonable time. This Motion was filed within a reasonable time after the Order was entered.

7. The Order does not specify to whom the California Property was abandoned. The Movant requests the Court supplement the Order to specify that the California Property was abandoned to the Debtor subject to the Lien.

WHEREFORE, The Society of Lloyd's respectfully requests the Court enter an order deeming the property located in Imperial County, California: 600 Broadway, El Centro, CA 92293 Lot 20, Blk 7, Townsite of El Centro, Imperial County was abandoned to Samme Jo Brady, subject to The Society of Lloyd's lien, and granting such other and further relief as the Court deems appropriate.

Respectfully submitted,



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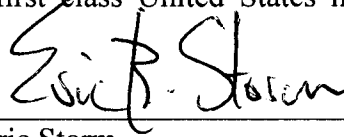
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Attorneys for The Society of Lloyd's

Certificate of Service

I hereby certify that a true and correct copy of the forgoing Motion to Supplement Order was served on the parties listed below via first class United States mail on this 1st day of February 2005.



Eric Storm

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