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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:)	Case No. 13-27297 (KCF)
)	
HAAS ENVIRONMENTAL, INC.)	Chapter 11
)	
)	Hearing date: 7-10-14
)	
)	
)	OBJECTION TO PLAN AND DISCLOSURE
)	
)	STATEMENT
)	

Ford Motor Credit Company LLC by its attorneys, objects to the debtor's plan and disclosure statement for the following reasons:

1. Ford Credit is the holder of a first purchase money security interest encumbering a number of vehicles owned by the debtor. Its loans are cross collateralized. The disclosure statement and plan do not refer to that and should. The plan should refer to the fact that Ford Credit will retain its liens on all vehicles it financed after confirmation. The plan and disclosure statement should be amended to reflect that Ford Credit will be paid the contract rate of interest set forth on each retail installment contract secured by the vehicle it financed.

- 1 2. The loans encumbering the vehicles are all in default both
2 pre-petition and post-petition. The disclosure statement does
3 not address how pre-petition arrears will be cured.
- 4 3. The plan and disclosure statement do not precisely state how
5 Ford Credit will be paid after confirmation.
- 6 4. The treatment of Ford Credit in the plan and disclosure
7 statement is unclear. The plan appears to state that Ford
8 Credit will retain its liens on the "property of the estate",
9 which presumably is the vehicles it financed and the terms of
10 its loans will remain in full force and effect, but the manner
11 of repayment of the loans is not precisely set forth and the
12 second sentence in both the plan and disclosure statement
13 appears to be incomplete and needs to be clarified. If the
14 debtor is paying Ford Credit in full in accordance with the
15 terms of its loans, but is extending the term to the extent it
16 is not paying pre-petition arrears in full at confirmation,
17 (thereby considering Ford Credit to be impaired), the plan
18 should state that.

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20 /s/ John R. Morton, Jr.
 John R. Morton, Jr., attorney
 for Ford Motor Credit Company LLC

21 Dated: 6-5-14
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