

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION

IN RE:

Case No.: 17-23426-PGH

ROBERT MATTHEWS,  
  
Debtor.

Chapter 11

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**MOTION TO SELL PERSONAL PROPERTY FOR SALVAGE VALUE**

COMES NOW, the Debtor, ROBERT MATTHEWS, by and through undersigned counsel, pursuant to 11 U.S.C. 363(b)(1) and hereby files this Verified Motion to Sell Personal Property for Salvage Value as described below and for the terms set forth herein:

1. Debtor proposes to sell for salvage value certain personal property more specifically described as the 1999 Jaguar XJ8, VIN: SAJHX1047XC853951 [see line 3.3, Schedule B, D.E. 19] (the “Jaguar”). ***See also Exhibit 1, photos of vehicle.***

2. The Jaguar is currently located in the garage on the real property located at 160 Royal Palm Way, Palm Beach, FL 33480 (the “160 Property”).

3. Counsel for the state court appointed receiver for the 160 Property contacted undersigned counsel and requested that the Jaguar be removed from the premises immediately in accordance with Fire Marshall concerns.<sup>1</sup>

4. Upon Debtor’s information and good-faith belief:

a. the Jaguar is inoperable and must be towed;

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<sup>1</sup> There is pending litigation in Palm Beach County Circuit Court involving the real property upon which the Jaguar is currently located titled *Ryan Black, derivatively, as a member of, and on behalf of, Palm House, LLC v. Robert Matthews, Mia Matthews, Nicholas Laudano, Leslie Robert Evans, Leslie Robert Evans & Associates, New Haven Contracting South, Inc., Mirabia, LLC, Botticelli Advisors, LLC, NJL Development Group, LLC, Palm, House Palm Beach, LLC*, 2015-CA-014228.

b. the Jaguar only holds a salvage value, if any, and the costs of towing may outweigh the Jaguar's gross value;

c. there are no known liens or encumbrances on the Jaguar.

5. Debtor holds a signed paper title to the Jaguar from the prior owner; however, Debtor never registered the Jaguar with the Florida Department of Motor Vehicles.

6. Debtor proposes to have the Jaguar removed from the 160 Property for net fair market salvage value, which is estimated to be at little to no value. **See Exhibit 2, NADA Guide Rough Trade-In Estimate.**<sup>2</sup>

7. The U.S. Trustee was contacted about the relief requested in this Motion and has no objection based on the information provided herein.

WHEREFORE, the Debtor, ROBERT MATTHEWS, moves this Honorable Court for an Order allowing the sale of the Jaguar for salvage value and for any other relief this Court deems just and proper.

Respectfully Submitted,

FLORIDA BANKRUPTCY ADVISORS, P.L.

/s/ Christian Panagakos

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Attorneys for Debtor

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<sup>2</sup> As Debtor does not know the true miles on the Jaguar, the NADA values were produced assuming zero (0) miles.

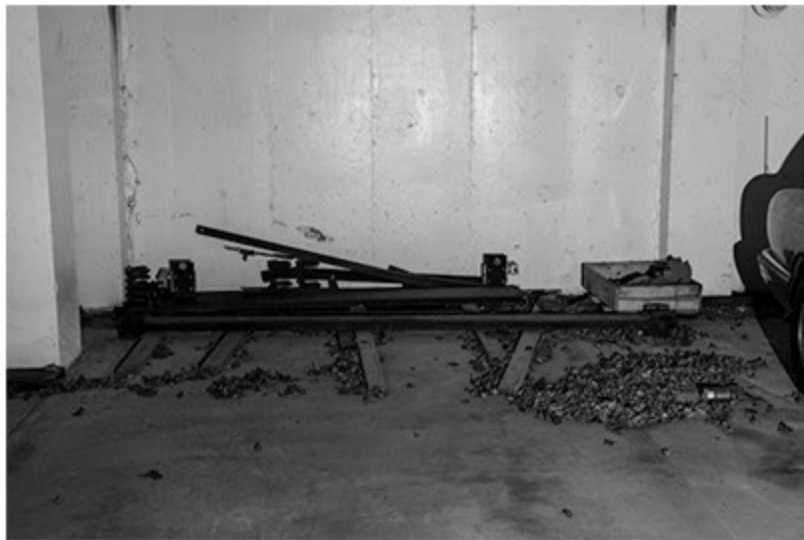
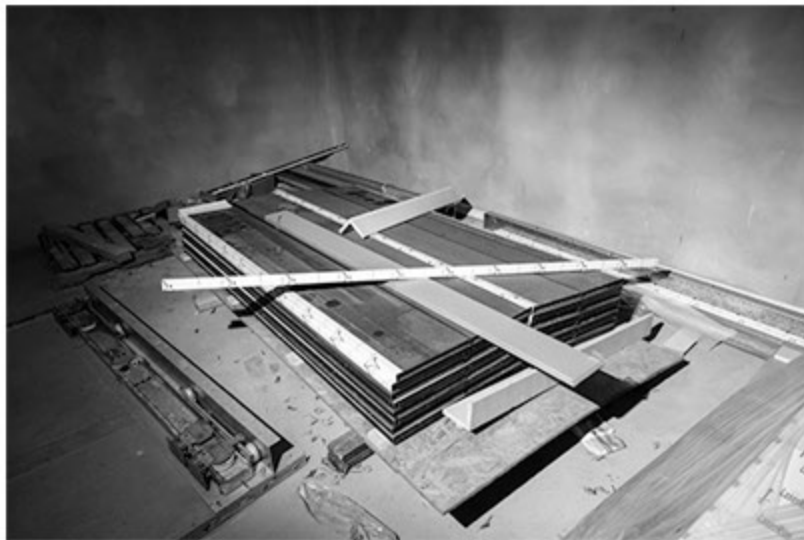
# EXHIBIT 1



SAJHX1047XC853951  
Jaguar Cars Ltd



Basement / Lower Level West Side











## NADAguides Value Report 11/30/2017

## 1999 Jaguar XJ

Sedan 4D

## Values

	Rough Trade-In	Average Trade-In	Clean Trade-In	Clean Retail
Base Price	N/A	\$900	\$1,500	\$3,175
Mileage (0)	N/A	N/A	N/A	N/A
Total Base Price	N/A	\$900	\$1,500	\$3,175

## Options (add)

Price + Options	N/A	\$900	\$1,500	\$3,175
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**Rough Trade-In** - Rough Trade-in values reflect a vehicle in rough condition. Meaning a vehicle with significant mechanical defects requiring repairs in order to restore reasonable running condition. Paint, body and wheel surfaces have considerable damage to their finish, which may include dull or faded (oxidized) paint, small to medium size dents, frame damage, rust or obvious signs of previous repairs. Interior reflects above average wear with inoperable equipment, damaged or missing trim and heavily soiled /permanent imperfections on the headliner, carpet, and upholstery. Vehicle may have a branded title and un-true mileage. Vehicle will need substantial reconditioning and repair to be made ready for resale. Some existing issues may be difficult to restore. Because individual vehicle condition varies greatly, users of NADAguides.com may need to make independent adjustments for actual vehicle condition.

**Average Trade-In** - The Average Trade-In values on nadaguides.com are meant to reflect a vehicle in average condition. A vehicle that is mechanically sound but may require some repairs/servicing to pass all necessary inspections; Paint, body and wheel surfaces have moderate imperfections and an average finish and shine which can be improved with restorative repair; Interior reflects some soiling and wear in relation to vehicle age, with all equipment operable or requiring minimal effort to make operable; Clean title history; Vehicle will need a fair degree of reconditioning to be made ready for resale. Because individual vehicle condition varies greatly, users of nadaguides.com may need to make independent adjustments for actual vehicle condition.

**Clean Trade-In** - Clean Trade-In values reflect a vehicle in clean condition. This means a vehicle with no mechanical defects and passes all necessary inspections with ease. Paint, body and wheels have minor surface scratching with a high gloss finish and shine. Interior reflects minimal soiling and wear with all equipment in complete working order. Vehicle has a clean title history. Vehicle will need minimal reconditioning to be made ready for resale. Because individual vehicle condition varies greatly, users of NADAguides.com may need to make independent adjustments for actual vehicle condition.

**Clean Retail** - Clean Retail values reflect a vehicle in clean condition. This means a vehicle with no mechanical defects and passes all necessary inspections with ease. Paint, body and wheels have minor surface scratching with a high gloss finish and shine. Interior reflects minimal soiling and wear with all equipment in complete working order. Vehicle has a clean title history. Because individual vehicle condition varies greatly, users of NADAguides.com may need to make independent adjustments for actual vehicle condition. Note: Vehicles with low mileage that are in exceptionally good condition and/or include a manufacturer certification can be worth a significantly higher value than the Clean Retail price shown.