

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

Timothy R. Kurtz v. Brittany Nicole Williams

Kurtz · No. 1:25-cv-00549-BLW · Decided March 13, 2026

SUMMARY

The United States District Court for the District of Idaho affirmed the bankruptcy court’s order allowing Brittany Nicole Williams to claim Idaho’s motor-vehicle exemption for an unregistered 2020 Kia Sorento. The court held that Idaho law does not require a motor vehicle to be registered to qualify for the exemption under Idaho Code § 11-605(3).

CASE DETAILS

COURT	United States District Court for the District of Idaho
WRITING FOR THE COURT	B. Lynn Winmill
JURISDICTION	United States District Court for the District of Idaho
DECIDED	March 13, 2026
DOCKET	1:25-cv-00549-BLW
DISPOSITION	affirmed
PROCEDURAL POSTURE	The Chapter 7 trustee appealed the bankruptcy court's order overruling his objection to the debtor's claimed Idaho motor-vehicle exemption.
STANDARD OF REVIEW	The district court reviews bankruptcy court decisions in the same manner as the Ninth Circuit. Questions of statutory interpretation are reviewed de novo.
PRECEDENTIAL VALUE	Unknown; memorandum decision from a federal district court
PARTIES	Timothy R. Kurtz, solely in his capacity as Chapter 7 Trustee of the bankruptcy estate of Brittany Nicole Williams v. Brittany Nicole Williams

TOPICS

- bankruptcy exemptions
- chapter 7
- statutory interpretation
- standard of review
- appellate procedure

PRACTICE AREAS

- Bankruptcy
- Bankruptcy exemptions
- Appellate procedure
- Statutory interpretation

QUESTIONS PRESENTED

1. Whether an unregistered vehicle qualifies as a 'motor vehicle' eligible for Idaho's motor-vehicle exemption under Idaho Code § 11-605(3).

HOLDINGS

1. An operational but unregistered self-propelled vehicle qualifies as a 'motor vehicle' for purposes of Idaho Code § 11-605(3), because the statute does not condition the exemption on current registration.

KEY QUOTATIONS

“It does not say that debtors may exempt a “registered motor vehicle.” Had the Idaho Legislature wished to condition the exemption on current registration status, it could have said so. It did not.”

“Where the legislature has chosen to allow debtors to exempt a “motor vehicle” up to a stated value, and where statutory definitions do not expressly require registration, the Court will not add that requirement.”

FACTUAL BACKGROUND

Brittany Nicole Williams filed a Chapter 7 bankruptcy petition on April 16, 2025. She claimed a \$10,000 exemption in a 2020 Kia Sorento under Idaho Code § 11-605(3), although the Sorento was unregistered on the petition date. The bankruptcy court overruled the Chapter 7 trustee's objection to the exemption.

PROCEDURAL HISTORY

Brittany Nicole Williams filed a Chapter 7 bankruptcy petition and claimed a \$10,000 exemption in a 2020 Kia Sorento under Idaho Code § 11-605(3). The vehicle was unregistered on the petition date. The bankruptcy court overruled the trustee's objection, and the trustee appealed to the United States District Court for the District of Idaho, which affirmed.

DISPOSITION

affirmed

CASES CITED

- In re George, 177 F.3d 885, 887 (9th Cir.)
- Jones v. U.S. Trustee, 736 F.3d 897, 899 (9th Cir.)
- Rousey v. Jacoway, 544 U.S. 320, 325 (2005)
- Tober v. Lang (In re Tober), 688 F.3d 1160, 1163 (9th Cir.)
- State v. Trusdall, 318 P.3d 955, 959-60 (Idaho Ct. App. 2014)
- State v. McKie, 417 P.3d 1001, 1005-06 (Idaho Ct. App. 2018)
- In re Sanders, 03.1 I.B.C.R. 57, 58 (Bankr. D. Idaho 2003)

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