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<sup>241</sup>In re Hall, 502 B.R. at 660.

<sup>242</sup>In re Hall, 502 B.R. at 660–61. The court highlighted a perceived flaw in the majority approach because some courts have inexplicably created an exception to turnover where possessory liens are involved. In re Hall, 502 B.R. at 661 (citing In re WEB2B Payment Solutions, Inc., 488 B.R. 387, 393, 57 Bankr. Ct. Dec. (CRR) 202, Bankr. L. Rep. (CCH) P 82449 (B.A.P. 8th Cir. 2013)).

<sup>243</sup>In re Hall, 502 B.R. at 664.

<sup>244</sup>In re Hall, 502 B.R. at 664–65.

<sup>245</sup>In re Hall, 502 B.R. at 665 (citation omitted).

<sup>246</sup>In re Hall, 502 B.R. at 663 (citations omitted).

<sup>247</sup>In re Hall, 502 B.R. at 665–66; see Conn. Nat’l Bank, 503 U.S. at 253–54 (court should consider canons of construction prior to legislative history).

<sup>248</sup>In re Hall, 502 B.R. 650, 666, 59 Bankr. Ct. Dec. (CRR) 6 (Bankr. D. D.C. 2014) (quoting Strumpf, 516 U.S. at 20).

<sup>249</sup>In re Hall, 502 B.R. at 660.

<sup>250</sup>In re Hall, 502 B.R. at 666.

<sup>251</sup>In re Hall, 502 B.R. at 666.

<sup>252</sup>In re Hall, 502 B.R. at 667; accord In re Barringer, 244 B.R. at 407 n.4 (majority “misconstrues” Whiting Pools).

<sup>253</sup>In re Hall, 502 B.R. at 667; contra Whiting Pools, 462 U.S. at 205–209.

<sup>254</sup>In re Hall, 502 B.R. at 667.

<sup>255</sup>In re Hall, 501 B.R. at 668 (citation omitted); cf. Wedoff, Automatic Stay, *supra* note 4 (noting that other than Hall, no judicial decision adopts such position with respect to property of the estate); but see also In re Barringer, 244 B.R. at 407.

<sup>256</sup>In re Hall, 502 B.R. at 669. The court criticized the majority’s reliance on section 362(f) as misplaced. In re Hall, 502 B.R. at 669–71.