

# Colbert v. Littman (In re Wagenknecht)

A trustee could not avoid and recover payment made to a law firm as a preferential transfer because the debtor did not exercise control or dominion over the payment to the law firm. Since, the debtor's mother made a direct payment to the debtor's creditors from an account over which the debtor had no interest or control, the the payment did not constitute a "transfer of an interest of the debtor in property" under section 547(b)

**Full title:** *Colbert v. Littman (In re Wagenknecht)*, 971 F.3d 1209, 2020 U.S. App. LEXIS 26790, Bankr. L. Rep. (CCH) P83,561, 2020 WL 4930035

**Court:** UNITED STATES COURT OF APPEALS FOR THE TENTH CIRCUIT

**Date published:** Aug. 24, 2020