

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

In re:

Case No. _____-jtg

Chapter 13

Hon. John T. Gregg

Debtor(s).
_____ /

**MOTION TO APPROVE TRIAL
MORTGAGE MODIFICATION**

The debtor(s) in the above-captioned case (the “Debtor”) hereby file(s) this motion (the “Motion”) requesting entry of an order approving a Trial Modification, certain material terms of which are summarized herein.¹ In support of the Motion, the Debtor states as follows:

1. The Debtor filed a petition for relief under chapter 13 on _____ .
2. The Debtor _____ confirmed a plan on _____ has not yet confirmed a plan.
3. The court has previously entered an order [Dkt. No. _____] referring the Debtor, the Mortgagee and any Co-Obligor to the MMP with respect to the following real property (the “Real Property”) constituting the Debtor’s primary residence:

Street Address: _____

Tax Parcel I.D. No.: _____

County: _____

4. The Mortgagee _____ filed proof of claim no.:__ _____ has not filed a proof of claim as of the date of this Motion other _____.

5. The Debtor and the Mortgagee have agreed to a Trial Modification, the terms of which have already been transmitted to the Trustee in writing and may be promptly obtained by other parties in interest by sending a request via electronic mail to the Debtor’s counsel of record. Any Co-Obligor has agreed in writing to the Trial Modification.

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the MMP procedures available at <https://www.miwb.uscourts.gov/content/judge-john-t-gregg>.

6.

7. The Trial Modification does not adversely affect unsecured creditors.

8. The Debtor is providing the Mortgagee, any Co-Obligor, the Trustee, and any other entity asserting an interest in the Real Property with twenty-one (21) days to respond to this Motion pursuant to LBR 9013(c) by serving them in accordance with Fed. R. Bankr. P. 7004.

WHEREFORE, the Debtor requests entry of an order approving the Trial Modification and for such additional relief as the court deems just and proper.

Dated: _____, 20__

Respectfully submitted,

/s/ _____

Telephone: _____

Email: _____