

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

In re:

Case No. _____-jtg

Chapter 13

Hon. John T. Gregg

Debtor(s).
_____ /

MOTION REQUESTING MMP MEDIATION

(the “Movant”)¹ hereby files this motion (the “Motion”) requesting the entry of a Mediation Procedures Order (the “Motion”). In support of the Motion, the Movant states as follows:

1. The court previously entered an order [Dkt. No. ____] referring the Debtor, the Mortgagee and any Co-Obligor in the above-captioned case to the MMP. The MMP has not been terminated.

2. To date, the parties have been unable to agree to the terms of a Mortgage modification or other resolution.

3. The Movant believes that mediation would assist the parties.

4. The Movant has selected the following mediator (the “Mediator”), who has agreed to serve in this matter, and is eligible pursuant to Rider B of the MMP procedures:

Telephone: _____

Email Address: _____

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>.

5. The Mediator has informed the Movant that he/she has no conflicts, or he/she has the following conflicts but the Movant has agreed to waive them:

6. The Movant agrees to abide by the MMP procedures and any orders of this court in connection with the mediation.

7. This Motion shall be served by the Movant on the Debtor, the Mortgagee, any Co-Obligor and the Trustee, as applicable, by using the notice and opportunity procedures under LBR 9013(c). The non-moving party (*i.e.*, the Debtor or the Mortgagee) shall have fourteen (14) days from the service of the Motion to file a response, including identification of a different preferred mediator or consent to the mediator proposed by the Movant.

WHEREFORE, the Movant requests that this court enter a Mediation Procedures Order and for such additional relief as the court deems just and proper.

Dated: _____, 20__

Respectfully submitted,

/s/ _____

Telephone: _____

Email: _____