

UNITED STATES BANKRUPTCY COURT
District of Maine

Hearing Scheduled

Date:

Time:

Location:

In the matter of:

Chapter 13
Case No.

Debtor

MOTION TO ALLOW AND DISALLOW CLAIMS
[MOTION TO AMEND ORDER CONFIRMING PLAN]
[OBJECTIONS TO CLAIMS]
[OTHER MOTION(S)]

NOW COMES the [debtor/trustee] and files the following motion(s) pursuant to the Order Confirming Chapter 13 Plan and D.Me.LBR 3015-3(d)(3).

I. Allowance of Claims. The [debtor/trustee] moves for an order of this Honorable Court allowing claims as follows:

A. Secured Claims. The following filed secured claims shall be allowed and paid by the trustee from the funds submitted by the debtor. The “allowed amount” states the value of the collateral for the purposes of 11 U.S.C. Sec. 506; the difference between the “filed claim” and the “allowed amount” (if any) shall be paid as unsecured as set forth below. To the extent that the allowed amount reflects arrearages to cure defaults pursuant to 11 U.S.C. Sec. 1322(b)(3), any defaults shall be cured upon payment of the allowed amount plus applicable interest; the underlying security interest remains unimpaired. To the extent that the allowed amount reflects full payment of the secured claim pursuant to the plan, the security interest is discharged upon payment of the allowed amount and any applicable interest.

#	Secured Creditor	Filed Claim	Allowed Amount	Interest

B. Priority Claims. The following filed priority claims shall be allowed and paid by the trustee from the funds submitted by the debtor. The “allowed amount” states the amount of the claim entitled to priority status; the difference between the “filed claim” and the “allowed amount:” shall be paid as otherwise proposed in this motion.

#	Priority Creditor	Filed Claim	Allowed Amount

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C. General Unsecured Claims. The following filed general unsecured claims shall be allowed and paid by the trustee from the funds submitted by the debtor. Class I claims shall be paid a dividend of _____%, or such greater amount as may be available after payment of all other claims; all claims are Class I claims unless otherwise specified. Class II claims shall be paid a dividend of _____%; Class II claims are defined as follows: [state N/A if not applicable]. Class III claims shall be paid a dividend of _____%; Class III claims are defined as follows: [state N/A if not applicable]. Class IV claims are “small claims” which shall be paid in full. A “small claim” is any claim for which the dividend would be \$50 or less which shall be allowed in the amount of \$50, and any claim of \$50 or less which shall be allowed as filed.

#	Unsecured Creditor	Allowed Amount	Dividend

II. Motion to Amend Order Confirming Plan. In order to accommodate the claims to be allowed pursuant to this omnibus motion, the [debtor/trustee] moves to amend the order confirming plan granted by the Court on _____ as follows:

A. As of _____, the debtor _____ has paid \$ _____ to the trustee. The debtor _____ shall pay the sum of \$ _____ per _____ commencing on _____ for _____ remaining in a plan which will run a total of _____ months. The total amount to be paid pursuant to the amended plan is \$ _____.

B. The [debtor/trustee] represents that the foregoing modification is feasible based on the following:

1.	Total Payments from debtor	\$
2.	Distributions Under Plan	\$
	Trustee’s Fees (10% of total)	\$
	Attorney’s Fees allowed to date	\$
	Administrative Reserve (if any)	\$
	Total Secured Claims (if any)	\$
	Total Interest (if any)	\$
	Total Priority Claims (if any)	\$
	Total Class I Unsecured Dividend (if any)	\$
	Total Class II Unsecured Dividend (if any)	\$
	Total Class III Unsecured Dividend (if any)	\$
	Total Class IV Unsecured Dividend (if any)	\$
	Total	\$

III. Objections to Claims. The [debtor/trustee] objects to the following claims as follows:

#	Creditor Name & Address	Claim Amount As Filed	Grounds for Objection

IV. Motion to Avoid Lien(s) Pursuant to 11 U.S.C. Sec. 522(f).

A. The debtor owns certain property consisting of

B. The debtor property is subject to a judicial lien in the amount \$ claimed by filed or recorded in the Registry of Deeds, [recording information].

C. The value of the debtor property is \$. The debtor entitled to an exemption of \$ pursuant to . The debtor property is subject to superior unavoidable liens to in the aggregate amount of \$.

D. Pursuant to 11 U.S.C. Sec. 522(f), the debtor entitled to avoid the judicial lien of to the extent of \$.

V. Other.

WHEREFORE, the debtor/trustee prays that the foregoing motions be granted and that the Court afford the relief sought in each.

Date:

Debtor / Trustee

[Notice of Hearing and Certificate of Service to All Listed Parties and any other Parties In Interest]