IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS

IN RE:

§
§   CASE NO. _____
§
§   CHAPTER 13
§

NOTICE TO RESERVE FUNDS

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW [Name of moving party] and notifies the Court and all parties in interest, including [insert name of Mortgage Lender] ("Mortgage Lender") as follows:

The following pleading(s) have been filed (must select at least one):

[   ]   An objection to proof of claim number [insert number here], filed by the Mortgage Lender;

[   ]   An adversary disputing the validity, priority, and extent of the lien asserted by Mortgage Lender, Adversary Proceeding Number [insert number];

[   ]   A response and objection filed by [insert name of responding/objecting party] to the Notice of Payment Change filed by the Mortgage Lender; and/or

[   ]   A response and objection filed by [insert name of responding/objecting party] to the Notice of Fees, Expenses and Charges filed by the Mortgage Lender.

In the event that an objection to a proof of claim or an adversary disputing the validity, priority, and extent of the lien has been filed, the Trustee is notified to reserve and place a hold on all funds that otherwise would be disbursed to Mortgage Lender until otherwise ordered by the Court. In the event of a response and objection to a Notice of Payment Change by Mortgage Lender or a Notice of Fees, Expenses and Charges, the Trustee is notified to reserve and place a hold on funds in the amount specified herein that otherwise would be disbursed to Mortgage Lender but for the filing of said Notice until otherwise ordered by the Court. The amount specified for the Trustee to reserve is $_____ per month.

This Notice to Reserve Funds is without prejudice to the rights of any party in interest to request other and further relief from the Court, including, but not limited to, requesting an order of the Court to authorize or compel the Trustee to disburse any reserved funds.

Respectfully submitted,

_____

Movant's Attorney

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I served the foregoing Notice to Reserve Funds on the following entities in the method described below on the   day of   ,
          .

Debtor(s)

Debtor's(s') attorney, if any,

Mortgage Lender

Attorney for Mortgage Lender, if known

Chapter 13 Trustee

_____

Authorized signature