

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

In Re: _____

Debtor(s)

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Case No.: _____

MOTION TO EXTEND THE DURATION OF LOAN MODIFICATION MATTER

NO HEARING WILL BE CONDUCTED ON THIS MATTER UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT [INSERT ADDRESS] ON OR BEFORE [INSERT DATE] WHICH IS AT LEAST FOURTEEN (14) DAYS FROM THE DATE OF SERVICE HEREOF.

ANY OBJECTION SHALL BE IN WRITING AND FILED WITH THE CLERK AND SHALL BE SERVED UPON MOVANT(S) AND ANY COUNSEL FOR THE MOVANT(S) PRIOR TO THE OBJECTION DEADLINE SET FORTH HEREIN. IF A TIMELY OBJECTION IS FILED, MOVANT(S) SHALL SET A HEARING ON THIS MATTER. NOTICE OF THAT HEARING WILL BE SERVED ONLY ON A PARTY FILING A WRITTEN OBJECTION.

ANY PARTY THAT DOES NOT FILE A WRITTEN OBJECTION SHALL BE DEEMED TO HAVE CONSENTED TO THE RELIEF SOUGHT HEREIN AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now [insert name of all movants] (referred to hereafter as “Movant(s)”)and files this Motion to Extend the Duration of Loan Modification Matter, requesting an extension of the current term of Loan Modification Matter and, for same, would respectfully show the Court as follows:

1. All capitalized terms which are used in this document are used and defined as in the Loan Modification Program adopted by this Court.

2. The Loan Modification Matter which is the subject of this Motion regards a note dated [insert the date of the note] held by [insert the name of the Lender/Service] and secured by Eligible Property described as [describe the collateral]. The *Initial Notice of Loan Modification*

Matter was filed on [insert filing date] as docket number [insert the docket number on the Court’s docket]. The term of the Loan Modification Matter will expire on [insert the date it expires] unless the term is extended.

3. The requested extension of the term of the Loan Modification Matter is necessary for the resolution of that Matter because [state all grounds supporting the allegation]. Movant(s) request that the term of the Loan Modification Matter be extended up to and including [insert the date].

4. [Select one:]

Movant(s) anticipate that the relief sought in this Motion [will] [will not] be disputed by any other LMM Party.

OR

All LMM Parties join in this Motion but cannot extend the term of the Loan Modification Matter by agreement pursuant to the provisions of the Loan Modification Program adopted by this Court.

5. A copy of the complete Portal history is attached as Exhibit “A” and is incorporated herein fully by reference.

WHEREFORE, PREMISES CONSIDERED, Movant(s) pray for an order of this Court:

1. Extending the term of the Loan Modification Matter up to and including [insert date] and
2. For such additional relief to which Movant(s) may be justly entitled.

[signature block for Movant(s)]

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a copy of the foregoing was served on each LMM Party by [describe method of service] and on the Chapter 13 Trustee by [describe method of service], all on the _____ day of _____, 20__.

[Name of person effectuating service]