

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
DIVISION**

IN RE:

Case No.  
Chapter 13

**MOTION TO TERMINATE 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 \_\_\_\_\_ ON OR BEFORE \_\_\_\_\_ 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, THE COURT 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 \_\_\_\_\_ (referred to hereafter as “Movant(s)”) and files this Motion to Terminate Loan Modification Matter, requesting the termination of the Loan Modification Matter described herein 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 is with regard to a note dated \_\_\_\_\_ held by \_\_\_\_\_ and secured by Eligible Property described as \_\_\_\_\_.

3. Termination of this Loan Modification Matter is requested because \_\_\_\_\_.

4. Termination of this Loan Modification Matter is sought [pick one:]

without prejudice to the initiation of another Loan Modification Matter with regard to the Eligible Loan and the Eligible Property described herein during the pendency of this bankruptcy proceeding.

OR

with prejudice to the initiation of another Loan Modification Matter with regard to the Eligible Loan and the Eligible Property described herein during the pendency of this Case.

OR

with prejudice to the initiation of another Loan Modification Matter with regard to the Eligible Loan and the Eligible Property described herein for \_\_\_\_\_.

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

6. Movant(s) anticipate that the relief sought in this Motion will \_\_\_\_\_ will not be disputed by the other LMM Parties.

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

1. Terminating this Loan Modification Program as described herein and
2. For such additional relief to which Movant(s) may be justly entitled.

Signature \_\_\_\_\_

**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\_\_\_\_\_.