

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF FLORIDA
DIVISION**

In re:

Case No.:

Chapter:

Debtor(s)

MOTION TO DEEM MORTGAGE CURRENT

**NOTICE OF OPPORTUNITY TO
OBJECT AND FOR HEARING**

Pursuant to Local Rule 2002-2, the Court will consider the relief requested in this paper without further notice or hearing unless a party in interest files a response within 21 days from the date set forth on the proof of service plus an additional three days for service if any party was served by U.S. Mail, or such other period as may be specified in Fed. R. Bankr. P. 9006(f).

If you object to the relief requested in this paper, you must file an objection or response electronically with the Clerk of the Court or by mail at 110 E. Park Avenue, Suite 100, Tallahassee, FL, 32301 and serve a copy on the movant's attorney, [name and address], and any other appropriate person within the time allowed. If you file and serve a response within the time permitted, the Court will either schedule and notify you of a hearing or consider the response and grant or deny the relief requested without a hearing.

If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

Comes now the Debtor(s) through the undersigned attorney and certifies according to the Trustee's records, the Debtor has paid and the Trustee has disbursed all arrears and regular on-going payments to _____ (the "Mortgagee") pursuant to the terms of the most current confirmed plan. The current confirmed plan provided for arrears in the total amount of \$ _____, and regular on-going payments to be paid directly to the Mortgagee by the Debtor. Since the Trustee's records reflect these arrearage payments are completed, and the Debtor certifies by the filing of the Motion that all post-petition payments, fees, expenses, and charges have been made, the mortgage debt to Mortgagee should be current as of _____ (month following the last cure payment) except for specified fees and charges.

Note any exceptions here:

All parties wishing to be heard shall appear at the scheduled hearing. If there is a dispute as to the status of the mortgage, the Court may take evidence at the hearing or treat the hearing as a preliminary hearing and set a further evidentiary hearing on a different date.

RESPECTFULLY SUBMITTED this ____ day of _____, 20 ____.

Debtor's Attorney

Certificate of Service

I HEREBY certify that a true and accurate copy of the foregoing has been furnished by electronic filing or first class mail on the same date as the document was electronically filed as reflected on the Court's docket to the following:

Debtor's Attorney