

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA**
www.flsb.uscourts.gov

In re:

Case No.:
Chapter 13

_____ /

MOTION TO DEEM MORTGAGE IS CURRENT

According to the Trustee's records, the debtor has paid, and the Trustee has disbursed, all arrearages and regular on-going payments to [Name of Mortgagee] (the "Mortgagee") pursuant to the terms of the last confirmed plan. The last confirmed plan provided for arrearages in the total amount of \$_____, and regular on-going payments in the total amount of \$_____. Since the Trustee's records reflect these payments are completed, the mortgage debt to Mortgagee should be current as of _____ (month following the last cure payment).

THE MORTGAGEE SHALL FILE ANY OBJECTION TO THE STATUS OF THE MORTGAGE DEBT AS CURRENT NO LATER THAN TWO BUSINESS DAYS PRIOR TO THE SCHEDULED HEARING.

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 preliminary and set a further evidentiary hearing on a different date.

Dated: _____

Attorney for Debtor _____

Address _____

Phone: _____

Fax: _____

Email: _____

Certificate of Service

I hereby certify that a copy of this Motion was served by *[indicate the specific form of service used in compliance with Rule 7004][Mortgagee]*, and by _____ on *[the Chapter 13 Trustee]*, and the Debtor on _____.

/s/ _____