**UNITED STATES BANKRUPTCY COURT**

**EASTERN DISTRICT OF NORTH CAROLINA**

**[CITY] DIVISION**

**IN RE:**

**[Debtor(s) name] CASE NO.**

 **CHAPTER**

 **DEBTOR(S).**

**MOTION TO TERMINATE THE LOAN MODIFICATION MANAGEMENT PROGRAM**

[FULL NAME OF MOVANT] hereby requests the termination of the Loan Modification Management Program in this case*,* and in support for said request attests as follows:

**Part 1: LMM Background**

[In separately numbered paragraphs, and in chronological order, identify each docket event related to the LMM in this case; for example “1. On October 11, 2013, Debtor filed a *Motion for Loan Modification Management* at Docket N0. 23.” Include in the chronology an account of each hearing and conference related to the LMM in this case; for example “13. On December 15, 2013 a status conference was held by the bankruptcy court, resulting in the entry of an Order on December 16, 2013 at Docket No. 25. Said Order required Debtor to submit IRS Form 4506T to the creditor via the Portal on or before January 3, 2014.”]

**Part 2: LMM Progress**

[In separately numbered paragraphs, and in chronological order, identify each of the specific steps taken by the debtor and creditor towards arriving at a consensual resolution as of the date of this Motion]

**Part 3: Reasons Supporting a Termination of the LMM Period**

[In separately numbered paragraphs, set forth the specific reasons why the creditor and debtor are unable to reach a consensual resolution, and/or set forth the specific reasons why the Court should terminate the Loan Modification Management Program in this case.]

**Part 4: Current Mortgage Status**

[In separately numbered paragraphs, set for the current monthly mortgage payment, the pre-petition mortgage arrearage, the post-petition mortgage arrearage, etc.]

A proposed order (substantially in the form of Form 11), and a complete and current printout of the entire account history from the Portal, are attached hereto.

Dated:

[Signature of Attorney]

[Printed name of attorney]

[Bar number of attorney]

[Address of attorney]

[Phone number of attorney]

[Email address of attorney]

Attorney for Debtor(s)