

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE**

In re: _____

Case No. _____

Chapter 13

Debtor(s) _____

**VERIFIED MOTION OF DEBTOR(S) TO IMPOSE AUTOMATIC STAY UNDER SECTION
362(c)(4) AS TO ALL CREDITORS, EXPEDITED HEARING REQUESTED**

Comes now the debtor, by and through counsel of record, and for this Motion states:

1. That the debtor filed this petition for relief under Chapter 13 of the United States Bankruptcy Code on _____.

2. That the debtor has had two or more prior pending cases dismissed in the last year because (include case numbers, when cases were filed and dismissed, and reasons for dismissals)

_____.

3. That the debtor's financial or personal affairs have substantially changed since the dismissal of the prior cases and the debtor feels that he can fund and fully perform this plan because

_____.

4. That Paragraph 20 of Schedule J accompanying the Chapter 13 petition signed by the debtor(s) provides:

Total projected monthly income: _____.

Total projected monthly expenses: _____.

Monthly net income: _____.

5. That the debtor's proposed plan payment is _____ via: employer deduction **OR** direct payment by the debtor to the Chapter 13 Trustee (circle one).

6. The debtor's prior Chapter 13 case was **OR** was not (circle one) dismissed because the debtor failed to provide adequate protection ordered by the Court or after the debtor

failed to file or amend the petition or other documents as required by the Court without substantial excuse.

7. That the debtor's prior Chapter 13 case was **OR** was not (circle one) dismissed while an action under section 362(d) of the Bankruptcy Code was pending or after such an action had been resolved with an order terminating, conditioning, or limiting the automatic stay.

8. That this petition was filed in good faith as to the creditors to be stayed and the debtor believes he/she can fully perform the terms of the proposed plan should it be confirmed by this Honorable Court.

WHEREFORE, the debtor moves this Honorable Court, pursuant to 11 U.S.C. sec. 362(c)(4), to extend the automatic stay protection of 11 U.S.C. sec. 362(a) as to all creditors for the duration of this Chapter 13 case, or until such time as the stay is terminated, modified, or annulled under section 362(d) of the Bankruptcy Code or further order of the Court. The debtor further requests that an expedited hearing be scheduled to hear this motion.

Respectfully Submitted,

Herbert Hurst (18721)
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CERTIFICATION OF DEBTOR(S)

I/We, the undersigned Debtor(s), declare under penalty of perjury that I/we have read the statements contained in the foregoing motion and that they are true and correct to the best of my/our knowledge.

Debtor
Date: _____

Debtor
Date: _____