**UNITED STATES BANKRUPTCY COURT**

**EASTERN DISTRICT OF LOUISIANA**

|  |  |
| --- | --- |
| **IN RE:**  **[DEBTOR(S) NAME(S)],**  **DEBTOR(S).** | **§ CASE NO. [INSERT]**  **§**  **§ CHAPTER [INSERT]**  **§**  **§ SECTION A** |

**MOTION TO COMMENCE LMM PROGRAM**

COMES NOW [INSERT NAME OF DEBTOR(S)] (“Debtor”) and moves the Court for permission to participate in the Loan Modification Management Program (“LMM Program”), as adopted and implemented by this Court pursuant to General Order 2024-3. In support, the Debtor represents:

1. All capitalized terms used in this motion and not otherwise defined are defined in this Court’s General Order 2024-3.
2. The physical address of the Eligible Property that secures the Eligible Loan is [INSERT].
3. The Creditor is [INSERT].
4. The Eligible Property [IS / IS NOT] the Debtor’s principal residence.
5. The Debtor has paid the non-refundable fee ($60) directly to the Document Preparation Software-approved vendor.
6. The Certification of LMM Eligibility and Readiness is attached hereto as Exhibit 1 and is fully incorporated herein by reference.
7. Each Debtor in this case is participating in the LMM Program in good faith and not for purposes of delay.
8. The names of any known non-debtor co-borrower or co-obligor on the underlying repayment obligation and any known entities with ownership interests in the Eligible Property are: [INSERT].
9. Bankruptcy Schedules I and J were filed by the Debtor [WITHIN / MORE THAN] six months of the date of the filing of this motion and are accurate as of the date of the filing of this motion and correctly state the current income and expenses of the Debtor.
10. [PICK ONE]

Counsel for the Debtor accepts the presumptive fee of $2500 for representation of the Debtor in the LMM Program as outlined in the Court’s General Order 2024-3. This disclosure shall be deemed to fulfill the requirements of Rule 2016 of the Federal Rules of Bankruptcy Procedure.

OR

Counsel for the Debtor accepts less than the presumptive fee of $2500 and instead accepts the amount of [INSERT] for representation of the Debtor in the LMM Program as outlined in the Court’s General Order 2024-3. This disclosure shall be deemed to fulfill the requirements of Rule 2016 of the Federal Rules of Bankruptcy Procedure.

OR

Counsel for the Debtor(s) will file a separate fee application for allowance of reasonable fees and costs incurred in the representation of the Debtor(s) in the LMM Program.

Respectfully submitted,

If signed in his/her individual capacity: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

[NAME OF DEBTOR]

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

[NAME OF DEBTOR]

If signed by Debtor’s counsel: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

[COUNSEL’S SIGNATURE BLOCK]