

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In the Matter of:

DEBTORS' NAMES,

Case No. 20__ - ____ -INI
(INSERT RAE/JES/MDM)
Chapter 13

**DEBTOR'S OBJECTION TO MOTION FOR RELIEF
FROM AUTOMATIC STAY BY [CREDITOR'S NAME]**

The debtor(s), by their attorneys, [firm name], hereby objects to the Motion for Relief from Automatic Stay filed by [creditor's name], upon the following grounds:

1. The debtor(s) have resumed making payments to the Chapter 13 Standing Trustee (or are current in their payments to the Chapter 13 Standing Trustee).
2. Upon information and belief, the collateral referenced in the motion for relief is insured (or will be insured and the debtor will provide proof of insurance forthwith).
3. The motor vehicle is necessary to an effective reorganization.
4. The order confirming plan provides adequate protection to the creditor.

WHEREFORE, the debtor(s) object to the Motion for Relief from Automatic Stay by [creditor's name] and request that this court set the matter for a hearing.

Dated at Milwaukee, Wisconsin, this ____ day of _____, 20__.

[Insert name, address, telephone number
and signature line]