

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In the Matter of:

NAME OF DEBTORS,

CASE NO. 20__-____- initials of judge
(RAE/JES/MDM)

Debtors.

CHAPTER 13

OBJECTION TO MOTION OF _____ FOR
RELIEF FROM AND ANNULMENT OF AUTOMATIC STAY

The above-named debtor(s), through their attorneys, [name of law firm], respectfully objects to the Motion for Relief from and Annulment of Automatic Stay filed on behalf of [Name of Creditor] and state(s) in support of said objection as follows:

1. The debtor(s) filed a Chapter 13 Plan on _____, which provided for payment of an accumulated pre-petition mortgage arrearage to [name of creditor], together with add-on interest during a ___-month Chapter 13 Plan.
2. Payments required by the Chapter 13 Plan are current and the Chapter 13 Plan remains feasible.
3. The value of the collateral in this matter, land and buildings located at [street address, city and state] exceeds the total mortgages and encumbrances thereon; the property is properly insured; and the property is necessary to an effective reorganization of the debtors.
4. The debtors have the ability to maintain all future required payments.
5. [If payments have been missed since the date of the filing of the bankruptcy petition, explain the reasons therefore. If all post-petition payments have been made in full and on time, state that fact here.]

Drafted By:

Name

Address

Telephone No.

WHEREFORE, the debtor(s) respectfully request that the court schedule a hearing in this matter and deny [creditor's name]'s motion for relief from and annulment of the automatic stay and grant the debtor(s) such other and further relief as the court deems just and appropriate.

Dated this ____ day of _____, 20__.

LAW FIRM NAME
ETC.