

1 Daniel H. Brunner
2 Chapter 13 Trustee
3 P.O. Box 1513
4 Spokane, WA 99210-1513
5 (509)747-8481

6 UNITED STATES BANKRUPTCY COURT
7 EASTERN DISTRICT OF WASHINGTON

8 In re:) Case No.:
9 Debtor(s).) MOTION FOR ORDER
10) DECLARING MORTGAGE
11) CURRENT, SWORN STATEMENT
12) IN SUPPORT THEREOF AND
13) NOTICE THEREON

14 TO: Creditor:
15 TO: Attorney for Creditor:
16 TO: Debtor(s) above named and
17 TO: Attorney for Debtor:
18 Court Claim No.

19 I. MOTION

20 Daniel H. Brunner, Chapter 13 Trustee in the above-referenced case, moves
21 the court pursuant to FRBP 3002.1(f) for an order declaring the mortgage current
22 in all respects, with all mortgage arrears cured as of January 1, 2012. The
23 Notice of Final Cure was filed on June 14, 2012 and served on June 14, 2012.
24 More than 21 days have passed and no timely response to the Notice of Final
25 Cure has been filed.

1
2
3 II. SWORN STATEMENT

4 The undersigned declares under penalty of perjury of the laws of the State of
5 Washington that the facts contained herein are true and correct to the best of his
6 knowledge and belief.
7

8 1. Based upon the Trustee's disbursement records all pre and post-petition
9 mortgage arrearages identified in the proof of claim together with any
10 supplements filed herein have been paid in full, and the Notice of Final Cure
11 Payment was filed on June 14, 2012 and served on June 14, 2012.
12

13 2. More than 21 days have passed since service of the Notice of Final Cure
14 Payment.
15

16 3. No timely response to the Notice of Final Cure Payment has been filed.
17

18 III. NOTICE
19

20 NOTICE IS GIVEN that, any objection must be filed with the Clerk of the
21 United States Bankruptcy Court for the Eastern District of Washington, Third
22 Floor, U.S. Post Office Bldg., West 904 Riverside, P.O. Box 2164, Spokane WA
23 99210, and served upon Daniel H. Brunner, Chapter 13 Trustee, P.O. Box 1513,
24 Spokane, WA 99210, no later than 21 days from the date of service of this
25 notice, plus any additional time allowed pursuant to F.R.B.P. 9006.
26

27 TRUSTEE'S MOTION FOR ORDER 2
DECLARING MORTGAGE CURRENT

1 YOU ARE FURTHER NOTIFIED that should you fail to object as set forth
2 above, the court will be requested to enter an order on an ex parte basis without
3 further notice to you.
4

5 DATED:

Daniel H. Brunner
Chapter 13 Trustee

/s/ _____