

1 NVB 105-10(5/15)

2 Debtor Attorney \_\_\_\_\_

3 Nevada Bar # \_\_\_\_\_

4 Firm Name \_\_\_\_\_

5 Address \_\_\_\_\_

6 City, State, Zip \_\_\_\_\_

7 Phone Number \_\_\_\_\_

8 Email Address \_\_\_\_\_

9 **UNITED STATES BANKRUPTCY COURT**  
10 **DISTRICT OF NEVADA**

11 \* \* \* \* \*

12 In re: ) BK  
13 ) CHAPTER 13  
14 Debtor(s). ) ATTORNEY REPRESENTED DEBTOR'S  
15 ) EX PARTE MOTION TO APPROVE  
16 ) MORTGAGE MODIFICATION  
17 ) MEDIATION AGREEMENT

18 The above-referenced Debtor requests the Court enter an Ex Parte Order approving the  
19 Mortgage Modification Agreement with \_\_\_\_\_ ("Lender") and states as  
20 follows:

21 1. The Court referred this matter to Mortgage Modification Mediation ("MMM")  
22 on \_\_\_\_\_ (DOCKET # \_\_\_\_\_).

23 2. The final MMM conference was held on \_\_\_\_\_.

24 3. The MMM Mediator filed a Final Report of Mortgage Modification Mediator  
25 on \_\_\_\_\_ (DOCKET # \_\_\_\_\_), reporting the parties reached an agreement.

26 4. Attached is a copy of the Agreement entered into between the parties (with all  
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28

1 personal identifiers redacted).

2  
3 5. Pursuant to the Agreement, the Lender will draft all documents required by the  
4 Agreement, other than pleadings or plans required to be filed in this case.

5  
6 6. Pursuant to the Agreement, the debtor shall amend or modify the plan, as  
7 necessary, to accurately reflect the agreement. Such amendment or modification shall be filed  
8 and served no later than 30 days of entry of the Order granting the instant motion.

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10 7. All payments shall be considered timely upon receipt by the trustee, not upon  
11 receipt by the Lender.

12  
13 8. The trustee may disburse the payment to the lender until such time as a modified  
14 plan is confirmed, or the case is dismissed or converted to another chapter.

15 WHEREFORE, the Debtor requests the Ex Parte Motion to Approve Mortgage  
16 Modification Agreement with \_\_\_\_\_ (“Lender”) be granted and for such other and  
17 further relief as this Court deems proper.  
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20  
21 Submitted by:

22  
23  
24 \_\_\_\_\_  
Attorney for Debtor(s)

Dated: \_\_\_\_\_