



What Is Our New Normal?

By: Sheryl Loesch, Clerk of Court

Here we are, nearly 18 months since experiencing the COVID-19 pandemic, and we are still talking about it. I doubt any of us could have imagined this happening in our lifetime, especially in this age of medical advances. The pandemic has touched every aspect of our lives, and it is likely each of us has a story to tell.

Fortunately, progress has been made in protecting us all from this virus, and we now find ourselves trying to return to normal. But, as we do so, most people are wondering: just what is the new normal? Although the pandemic has impacted each of us in numerous ways—physically, mentally, and financially—I am choosing to look forward and consider the positives that have come out of this otherwise dire situation. I'm choosing to make lemonade from the lemons.

We are very fortunate to work in a court system in the United States. Many of you know that I am the current President of the International Association for Court Administration, otherwise known as IACA. I work with a Board of Directors made up of judges and court administrators in judiciaries around the globe. So I am familiar with how foreign judiciaries have functioned throughout the pandemic.

While all courts were caught off guard by this pandemic, many did not have the capacity to function and meet the needs of the public they serve. Things we take for granted—a stable internet provider, state-of-the-art technological equipment, personal protective equipment—were not readily available in many countries. In order to have justice served, some judges actually held court in metal storage containers that were strategically placed throughout the areas they served. In many countries, even though internet service was available, it was not robust enough to support the demand and was therefore rendered unstable and unreliable, making both remote court proceedings and remote work nearly impossible.

One thing that every court had in common, though, regardless of the court's respective circumstances, was the commitment to dispense justice. Judges and court

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staff went to great lengths to see that justice continued to be dispensed—and they were adamant about doing everything in their power to keep court operations going in whatever capacity they could. This is a true testament to the commitment and passion judges and court staff have for the work they do. They realize the importance. They realize that what they do impacts people's lives. At the end of this message, I am including some pictures from the Supreme Court in the Philippines that show the dedication of court staff.

In our Court, we learned how to further expand the use of technology to continue functioning. We already knew the importance of teamwork. The strong sense of “team” that our Court is known for helped keep things running smoothly even though we were apart from one another. We had a renewed appreciation for our families and our pets (yes, we are a Court of true pet lovers!). For me, when my home internet wasn't the fastest at the moment I needed it, or when my Zoom screen would lag, instead of getting annoyed, I tried to appreciate what we have available to us here in the United States.

I was thankful that I was not facing what court administrators had to face in other countries. My hope is that the appreciation I felt will continue for all of us as we move into whatever will be our “new normal.”

I, for one, am looking forward to everyone returning to work so we can all be together again. There definitely is light at the end of the tunnel.

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Amendments to Local Rules to Take Effect on August 1

**By: Hon. Lori V. Vaughan, Judicial Liaison to
Local Rules Lawyers' Advisory Committee**

The judges of the United States Bankruptcy Court for the Middle District of Florida have approved amendments to the Local Rules, effective August 1, 2021. A brief summary of the revisions is set forth in the memorandum found [here](#), and copies of the rules can be viewed [here](#). Attorneys and parties who appear before the Court are encouraged to review the amendments.

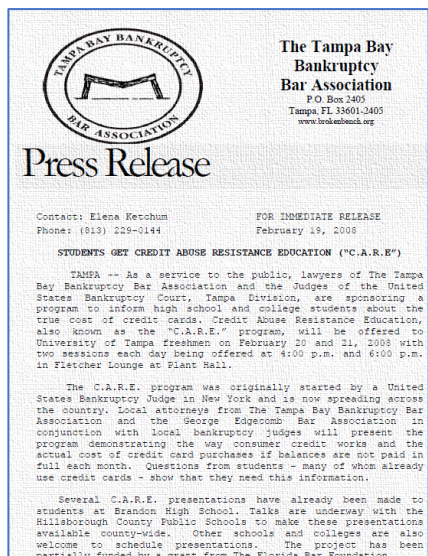
The Court appreciates all comments and input received from the Bar during the past year. And the Bankruptcy Judges wish to thank the following members of the Local Rules Lawyers' Advisory Committee for their hard work and assistance: Jason A. Burgess, David W. Fineman, Elena Paras Ketchum, Daniel A. Velasquez, and Raymond Waguespack.



Who C.A.R.E.S.? We All Should!

(And Here's How to Help)

By Hon. Catherine Peek McEwen



Ever heard of the “C.A.R.E.” program? Gee, I hope so, but I can’t blame you if you haven’t, given the stops and starts we’ve had with C.A.R.E. locally. And I hope you will stick with me to the end of this article because we need your help.

First some national and local backstory: The acronym stands for Credit Abuse Resistance Education. It is a national, nonprofit organization that started as a grassroots initiative by Bankruptcy Judge John C. Ninfo, II (W.D.N.Y., now retired) to teach high school and college kids about responsible use of credit and the dangers of using credit irresponsibly. Gradually, the program spread throughout the country as other bankruptcy courts and bankruptcy bars jumped on

Judge Ninfo’s bandwagon, creating local chapters that provide speakers to make presentations at schools. Since then, the program has been formally organized as an IRS 501(c)(3) entity and is now shepherded by the American Bankruptcy Institute, which provides some funding to support the administration and online infrastructure of C.A.R.E.

C.A.R.E.’s robust website starts here: www.care4yourfuture.org; program resources are here: [Volunteer Resources \(care4yourfuture.org\)](http://VolunteerResources(care4yourfuture.org)). Program resources include presentations using step-by-step outlines, videos, Q&As, and games that can be created to fit a particular audience. One thing we’ve learned from the pandemic is that, if need be, all the materials can be presented remotely.

Our Tampa division got interested in the program back in 2007 (almost 15 years ago!), after learning of the successful C.A.R.E. program offered in the Southern District of Florida. Tampa’s C.A.R.E. program was initiated with Judge Rodney May (now retired) as its judicial advisor and the Tampa Bay Bankruptcy Bar Association as its organizer. The original presentation materials were largely drawn from the Southern District’s. Some of the initial institutions that benefitted from Tampa’s early C.A.R.E. efforts included Brandon, Chamberlain, Tampa Prep, and Academy of the Holy Names high schools, as well as all the incoming freshmen at the University of Tampa.

Over time, various bankruptcy lawyers have served as the contact point — Elena Ketchum, Barbara Hart, and Brad deBeaubien, to name some.

Fast forward to more recent times, when we saw the need to re-engage because our “chapter” had become essentially dormant. Bankruptcy lawyer Michael Hooi agreed to be our area’s C.A.R.E. coordinator, and in the fall of 2019, we invited some officials from the Hillsborough County School System and the Florida Council on Economic Education (“FCEE”) to attend a little show-and-tell meeting to inform them of our availability to visit schools. [See Michael’s recap here in the October 2019 issue of *Court Connection*: [Tampa CARE Chapter Holds Kickoff Orientation](#).] But then the pandemic hit, so there was no going into the schools. And once again, we find ourselves classified by the C.A.R.E. mothership as dormant.

Aside from the pandemic, another recurring complicating factor is the lack of class time available for extracurricular presentations such as C.A.R.E., meaning it’s hard to get into the schools. Although financial literacy advocates such as the FCEE have pushed the Florida Legislature to make financial literacy a required course, at this point it is but a half-credit elective. According to the Southern District’s Chief Bankruptcy Judge Laurel Isicoff, who is on the board of the FCEE, “the new BEST [Benchmarks for Excellent Student Thinking] standards have financial literacy folded in as part of the mandatory math curriculum, but that portion of the curriculum doesn’t go into effect for another two years.” So we are a bit away from when the schools must make time for financial literacy.

Yet every year that passes by without our reaching out to the youths in our community results in more of them facing an uncertain financial future, ill-equipped to handle their personal finances. Yes, that means one day they likely will have to make a pit stop in our court, which is good for bankruptcy lawyers, I suppose. But our court should be the fresh start repair shop for circumstances outside the control of the debtors (job loss, divorce, health issues), not because they are unknowledgeable about the proper use of credit.

This is where you can help with the financial literacy movement locally. Do you have a connection with a group of kids or young adults—maybe through scouting, a church or synagogue, a private school, a teacher, the University of Tampa, or with a community center, non-profit mentoring program, or an after-school program? If so, offer to arrange a presentation. And if the offer is accepted, email Michael at mhooi@srbp.com. You don’t even have to volunteer to be a presenter. Just get us in the door!

[Editor’s note: Judge McEwen is a member of C.A.R.E.’s national advisory board.]



CREDIT
ABUSE
RESISTANCE
EDUCATION

The Truth About Credit

Why does your credit matter?

- A credit check may be required by your employer to get a job.
- Your credit impacts your ability to get an apartment or buy a home.
- Having a strong credit history can lead to lower interest rates on future credit.
- Financial freedom helps you meet your goals.

Think about your spending

- How much do you usually spend each day?
- Are you a price conscious shopper?
- What do you spend most of your money on?
- Paying late and carrying a balance near your credit limit can hurt your credit score.

Debt

Good

- ✓ Establish Credit
- ✓ Consumer Protection
- ✓ Rewards
- ✓ Make Important Purchases

Bad

- ✗ Impulse Spending
- ✗ Ruin Credit
- ✗ Spend More Money
- ✗ Late Fees and Interest

What Makes A Credit Score

65% of Total Score

- 35% Payment History
- 30% Amounts Owed
- 15% Length of History
- 10% Credit Mix
- 10% New Credit

Get a free credit report each year at annualcreditreport.com

Tips



Pay in Full Every Month



Keep Balance Low

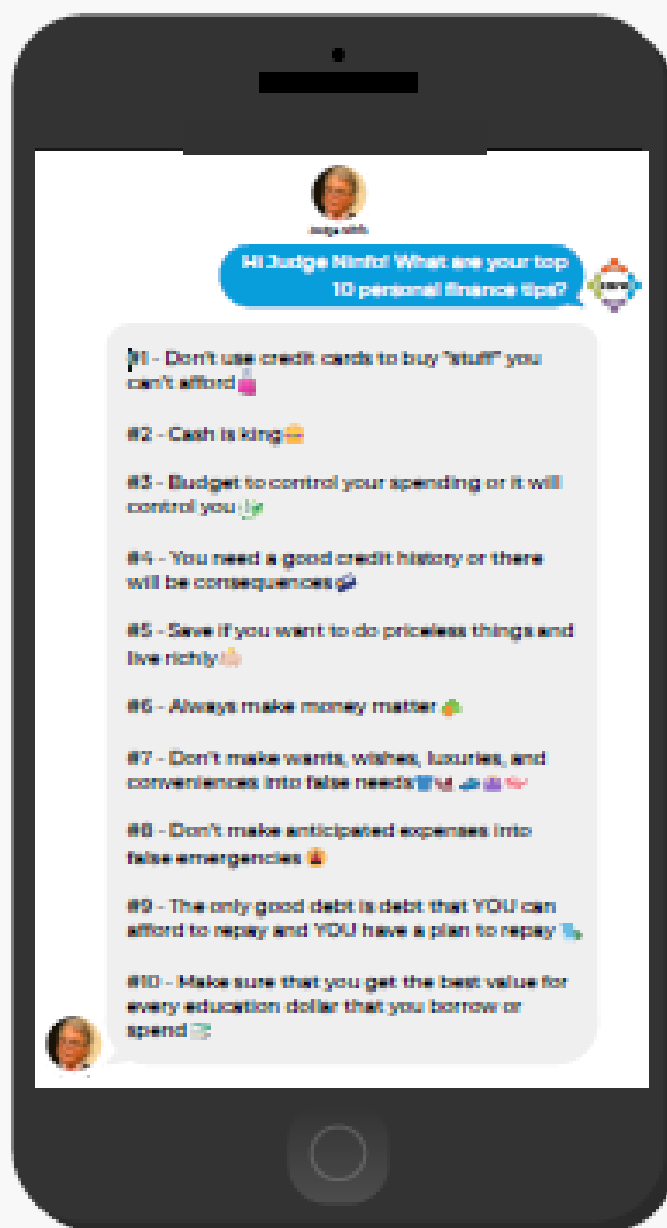


Pay on Time

Sources: Credit Abuse Resistance Education, "The Truth About Credit Presentation," from care4yourfuture.org
CreditCards.com, "The 4 Best and Worst Things About Credit Cards," from <https://www.creditcards.com/credit-cards-news/andberg-4-best-worst-things-about-credit-cards-1377.php>

care4yourfuture.org

JUDGE NINFO'S TOP 10 PERSONAL FINANCE TIPS



www.gpsociallibrary.org



**Raymond Waguespack Retires After
35 Years of Service in United States Courts**
By: Hon. Caryl E. Delano, Chief Judge

On June 30, 2021, one of our Court's most valued employees, Raymond Waguespack, the Director of Operations for the Middle District's Clerk of Court, retired after almost 20 years of service with our Court and a total of 35 years of service with the United States Courts.

Raymond is a native of St. James Parish, Louisiana. Raymond's service with the Courts began in June 1986, when he started at the Fifth Circuit Court of Appeals in New Orleans as a file clerk, a mail clerk, and a traveling courtroom bailiff. After just a few months, the Fifth Circuit's Clerk of Court recognized Raymond's talents and promoted him to a more responsible position as a generalist clerk.

In 1987, Raymond moved to Atlanta, where he worked as a docket clerk for the Eleventh Circuit of Appeals for four years, and then for the Bankruptcy Court for the Northern District of Georgia for ten years, first as a case administrator and then as a quality control and CM/ECF analyst. So, Raymond was there in the early days of CM/ECF. While Raymond lived in Atlanta, he earned an associate degree in business administration from DeKalb College and a bachelor's degree, cum laude, in History from Georgia State University.

In December 2001, Raymond moved to Tampa, where he started working in the Tampa Division, first as a case manager, and—within 18 months—as the supervisor on Judge Glenn's team. Raymond was actively involved with the Middle District's implementation of CM/ECF.

In July 2008, a week or so after I was appointed to the bench and inherited Judge Glenn's Tampa caseload, Raymond was promoted to the position of Deputy-in-Charge of the Orlando Division. In this role, Raymond was very involved in the George C. Young U.S. Courthouse Renovation Project, and he led the development and implementation of our Automated Data Interface, which is used by the Clerk's Office to automatically enter tens of thousands of docket entries each year.

In April 2012, Raymond was promoted to a districtwide position as the Clerk of Court's Director of Operations. As Director of Operations, Raymond took on what I can attest was a huge responsibility working as the project manager overseeing the Court's mission to become "One Court, One Team" with uniform processes and procedures. Raymond worked on numerous CM/ECF programs, and participated on the Court's Official Forms Update Committee, the District's Steering Committee, the Internal Procedures Manual Committee, and the Local Rules Lawyers' Advisory Committee. In a nutshell, if the Court has a rule, a form, or a procedure, Raymond had a hand in it.

Raymond may be retiring, but somehow, I don't think he will be sitting in a rocking chair. I know that he has many valuable years ahead of him and will energetically bring his talents to whatever the future has in store for him.

On behalf of the judges of the Middle District, I want to thank Raymond for his 20 years of service to our Court and his 35 years of service to the United States Courts.



Pictured: Raymond Waguespack and Chief Judge Caryl E. Delano



Pictured: Judge Michael G. Williamson and Raymond Waguespack

Judge McEwen Swears In Former Intern **By: Ed Comey, Law Clerk to Judge Williamson**

On Friday, April 16, 2021, Judge McEwen administered the Oath of Admission to The Florida Bar to Sarah Naccache.



Sarah earned her bachelor's degree in Public Policy and Administration from St. Petersburg College in 2014 and her law degree from Western Michigan University Cooley Law School in 2021. Out of 142 students in her graduating class, Sarah graduated 10th.

While in law school, Sarah earned Book Awards (Certificates of Merit) in eleven courses (Civil Procedure I, Civil Procedure II, Constitutional Law II, Evidence, Florida Civil Procedure, Personal and Professional Responsibility, Property I, Property II, Scholarly Writing, Taxation, and Wills, Estates & Trusts)!

During the Fall 2020 semester, Sarah interned with Judge McEwen's chambers.

Sarah currently works as an associate litigation attorney in the Tampa office of the Kass Shuler Law Firm. We wish Sarah the best of luck as she embarks on her legal career.



Upcoming Events

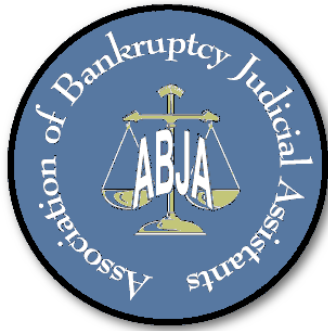
August 26	TBBBA Annual Dinner <i>Palma Ceia Golf & Country Club, Tampa</i>
September 9	Investiture of Hon. Lori V. Vaughan <i>Sam M. Gibbons United States Courthouse, Tampa</i>
September 24	JBBA Annual Seminar <i>Sawgrass Marriott, Ponte Vedra Beach</i>
October 5 – 9	National Conference of Bankruptcy Judges <i>JW Marriott, Indianapolis</i>
October 28	Bankruptcy Law & Practice: View from the Bench 2021 <i>CAMLS – Center for Advanced Medical Learning and Simulation, Tampa</i>
November 3	Luncheon in Honor of Hon. Jerry A. Funk <i>The River Club, Jacksonville</i>



**Central Florida Bankruptcy Law Association, Inc.
Second Quarter News 2021**

CLE Webinars: This year, we have already had five CLE Webinars (available for viewing through our website, www.cfbla.org) with more scheduled throughout the year:

- *Debtor's Insurance Bad Faith Claims: The overlooked asset that may be worth millions! (January)*
- *D&O Liability Litigation, Cutting Edge Strategies & Insight (March)*
- *Getting to Know your Judge with the Hon. Lori V. Vaughan (April)*
- *Subchapter V – Small Business Reorganization: Practice Pointers and Strategies (May)*
- *Introduction to the New Chapter 11 Opening Reports Forms (July)*



**ABJA CERTIFIED BANKRUPTCY ASSISTANT
AND PROFESSIONAL SKILLS SEMINARS
October 12-15 – Tulsa, Oklahoma**

The Association of Bankruptcy Judicial Assistants (“ABJA”) is sponsoring its annual Certified Bankruptcy Assistant Seminar and Exam on October 12 – 13, and its Professional Skills Seminar on October 14 – 15, at the DoubleTree by Hilton in downtown Tulsa, Oklahoma.

The Certified Bankruptcy Assistant (“CBA”) program is aimed specifically toward legal assistants and paralegals in the bankruptcy field. The two-day certification program includes training workshops and two exams that cover grammar usage and writing; the Bankruptcy Code and Rules; ethics, and research and proper legal citation.

If you’re already a CBA in need of continuing education credits or a legal assistant or paralegal who is interested in enhancing your professional development, the Professional Skills Seminar is your opportunity to join judicial assistants and bankruptcy professionals in learning best practices.

For more information on the CBA or Professional Skills programs, please visit the ABJA’s website, www.abja.org or contact Laura Stevenson at Laura.Stevenson@flmb.uscourts.gov.



CASE LAW UPDATE FOR Q3 2021 ISSUE OF THE COURT CONNECTION

Editors:

Bradley M. Saxton & C. Andrew Roy, Winderweedle, Haines, Ward & Woodman, P.A.

Eleventh Circuit Cases

Chua v. Ekonomou

1 F.4th 948 (11th Cir. 2021)

Splitting with four other circuits, the Eleventh Circuit held that a trustee's protection from suit under the *Barton* doctrine ends when the case is over. The court grounded its ruling on subject-matter jurisdiction, reasoning that jurisdiction ends when there is no longer a *res* controlled by a single court. The Court declined to follow the other circuits, which placed significant weight on the policy concerns underlying *Barton* protection. Even so, the Court still upheld the dismissal of the case based upon a finding that the receiver was entitled to judicial immunity. Although the case involved a state court receiver, the holding is equally applicable to bankruptcy trustees. Therefore, under this decision, once a bankruptcy case is over, the trustee could be sued in another court.

Bankruptcy Court Cases

In re De Bauer

628 B.R. 355, 358 (Bankr. M.D. Fla. 2021) (Jennemann, J.)

The bankruptcy court held that the debtor, a non-citizen not legally permitted to reside in the United States, was entitled to a homestead exemption under

Florida law. Ordinarily, a debtor claiming the homestead must meet both an objective and subjective test: the debtor must actually occupy the home; and they must express an actual intent to live there permanently. Because of the debtor's immigration status, she could not form an *actual* intent to live in the home permanently. Even so, Judge Jennemann concluded that the debtor met the subjective test because at least one family member living in the home had made sufficient credible attempts to gain legal status of a permanent resident in the United States: the Debtor's daughter had lived continuously at the home since she arrived in the United States and had made a formal request to gain legal status by enrolling in the DACA program and applying for a green card after her marriage to a U.S. citizen. As a result, the Debtor's homestead exemption survives.

In re Givans

2021 WL 1991861 (Bankr. M.D. Fla. May 20, 2021) (Jennemann, J.)

The debtor claimed certain tax refunds owned by him and his non-filing spouse as tenants by the entirety exempt. The trustee objected because the debtor's wages were the sole source of the funds that generated the refund. Relying on her decisions in *In re Hinton* and *In re Freeman*, Judge Jennemann once again held that married couples can own tax refunds as TBE, regardless of which spouse contributed the most income. Judge Jennemann then overruled the trustee's objection because the trustee failed to rebut the presumption of TBE ownership.

In re Forrest

2021 WL 1784085, 2021 Bankr. LEXIS 1212 (Bankr. M.D. Fla. Apr. 2, 2021) (Colton, J.)

In a very thorough opinion addressing whether a debtor's violation of a PACA trust renders the debt nondischargeable under § 523(a)(4), Judge Colton rejected the majority view and sided with the minority view that such a debt can be discharged. In doing so, Judge Colton relied on the fact that PACA does not require the funds to be segregated. Ultimately, Judge Colton chose to err on the side of the "strict and narrow" interpretation of § 523(a)(4), concluding that "some clear lines of demarcation should exist before an individual is saddled with a business debt for eternity."

The Court certified the order for direct appeal to the Eleventh Circuit because of the importance of the issue and the split of authority within the Circuit.

In re Wildwood Villages, LLC

2021 WL 1784408, 2021 Bankr. LEXIS 1188 (Bankr. M.D. Fla. May 4, 2021) (Colton, J.)

Judge Colton denied a motion by plaintiffs to allow a class claim under Bankruptcy Rule 7023 in a Subchapter V case. In doing so, Judge Colton rejected the debtor's contention that Subchapter V prohibits class claims altogether. Instead, Judge Colton held that bankruptcy courts have discretion to permit a class claim in a Subchapter V case. But in this particular case, Judge Colton exercised that discretion and decided not to permit a class claim. Judge Colton then established claims procedures to address the various claims.

In re ENKOGS1, LLC

626 B.R. 860 (Bankr. M.D. Fla. 2021) (Jennemann, J.)

A creditor filed a motion to determine that the debtor, which owned and operated a 79-room hotel, was a "single asset real estate" project and therefore ineligible for relief under Subchapter V of Chapter 11. Judge Jennemann denied the motion, finding that hotels generally, and this hotel in particular, are distinguishable from apartment projects, and do not constitute single asset real estate projects. Judge Jennemann's decision was based on the fact that the debtor provided many services besides just renting rooms: the hotel employed fifteen persons; cleaned rooms every day; served breakfast; and provided a swimming pool, a fitness center, laundry, internet, and phone services. According to Judge Jennemann, these services constitute something more than "operating the real property and activities incidental thereto."



UNITED STATES TRUSTEE'S CORNER

By: Jill Kelso, Orlando Office
of the U.S. Trustee

Mary Ida Townson Appointed U.S. Trustee for Florida, Georgia, Puerto Rico, and the U.S. Virgin Islands

Attorney General Merrick B. Garland has appointed Mary Ida Townson as the U.S. Trustee for Florida, Georgia, the Commonwealth of Puerto Rico, and the U.S. Virgin Islands (Region 21). Ms. Townson will assume her duties in June and will replace Nancy Gargula, who is the U.S. Trustee in Region 10 and who has served as the interim U.S. Trustee in Region 21 since April 2019.

Ms. Townson brings more than 30 years of bankruptcy experience to the position, including the past 18 years as a standing chapter 13 trustee for the Northern District of Georgia and, before that, in private practice representing debtors and creditors and serving as a chapter 7 panel trustee. She has also held various leadership positions with the National Association of Chapter 13 Trustees and the Southeastern Bankruptcy Law Institute over the past 10 years. Ms. Townson received a Bachelor of Arts with Honors from Auburn University and her Juris Doctor from the University of Georgia Law School.

"Ms. Townson has committed her career to improving the bankruptcy system and we are excited to have her join our leadership team," said U.S. Trustee Program (USTP) Director Cliff White. "We also are indebted to Ms. Gargula for her expert leadership of Region 21 over these past two years."

The USTP is the component of the Justice Department that protects the integrity of the bankruptcy system by overseeing case administration and litigating to enforce the bankruptcy laws. The USTP has 21 regions and 90 field office locations. Region 21 is headquartered in Atlanta, Georgia, with additional offices in Macon and Savannah, Georgia; Miami, Orlando, Tallahassee, and Tampa, Florida; and San Juan, Puerto Rico.

**Notice Regarding The United States Trustee Program's
New Chapter 11 Periodic Reports
*28 C.F.R. § 58.8 - Effective: June 21, 2021***

On December 21, 2020, the U.S. Trustee Program (USTP), as authorized by 28 U.S.C. § 589b, promulgated “Procedures for Completing Uniform Periodic Reports in Non-Small Business Cases Filed Under Chapter 11 of Title 11” (the “Procedures”). Under the Procedures, Chapter 11 debtors in possession and trustees (other than small business debtors and subchapter V debtors) in every judicial district where the USTP operates are required to file monthly operating reports and post-confirmation reports using uniform, data-embedded forms.

The Procedures and the new forms become effective for all reports filed on or after June 21, 2021. The USTP encourages bankruptcy professionals to contact their local USTP offices to learn more about the forms before June 21, 2021. Local USTP offices will make training available for bankruptcy professionals about completing, filing, and serving the new uniform MOR and PCR forms.

The Procedure, the uniform forms, and instructions for their use and filing (which may be periodically updated before the effective date) are available on the USTP's website: <https://www.justice.gov/ust/chapter-11-operating-reports>.

Please address any questions to your local Office of the United States Trustee. Contact information for the USTP's local offices in the Middle District is available at: <https://justice.gov/ust-regions-r21>.



A Message From Your Point & Click Authors.

Get Ready for NextGen CM/ECF!

The United States Bankruptcy Court for the Middle District of Florida (FLMB) will be upgrading its current CM/ECF system to NextGen CM/ECF on Monday, November 22, 2021.

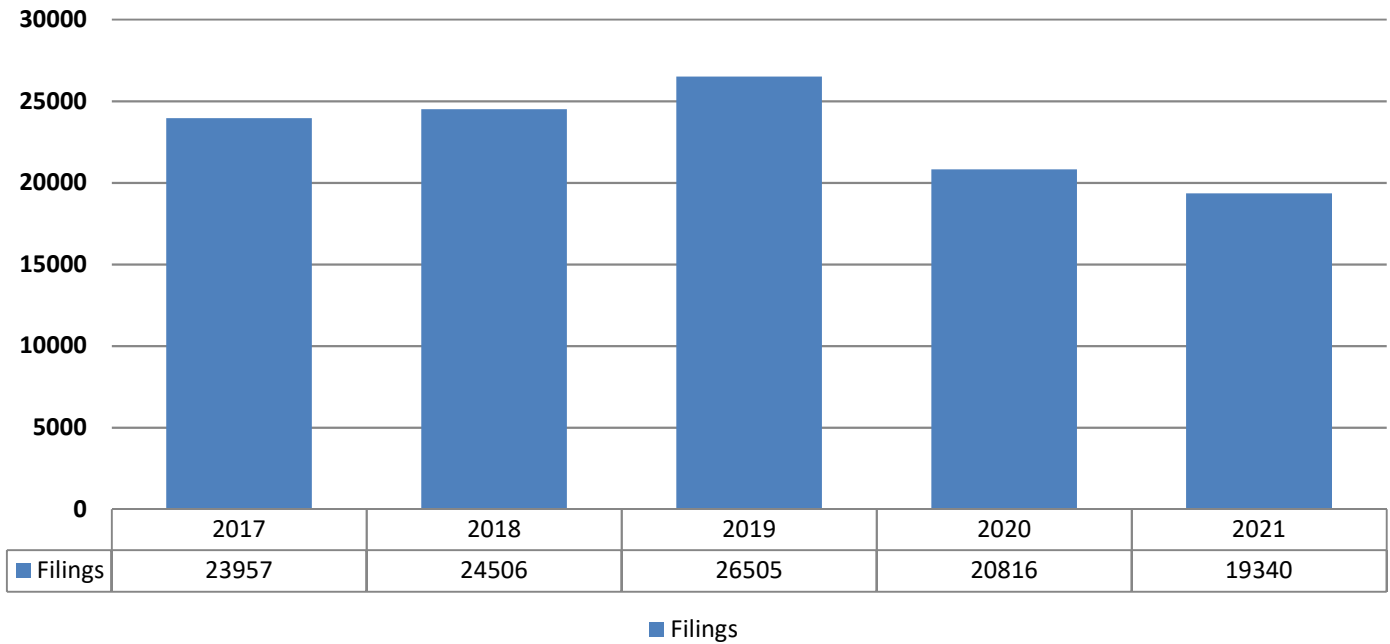
NextGen is the culmination of a multi-year project headed by the Administrative Office of the U.S. Courts to provide for the current and future filing and case management needs of all CM/ECF users.

The NextGen system will provide users with several benefits, including the ability to maintain a Central Sign-On and password for electronic filing and PACER access in all federal courts (bankruptcy, district, and appellate). This Central Sign-On feature allows users access to all courts in which they have permission to file.

Please update your PACER account and link your CM/ECF filing credentials to your updated PACER account. Please [click HERE](#) for step-by-step instructions.

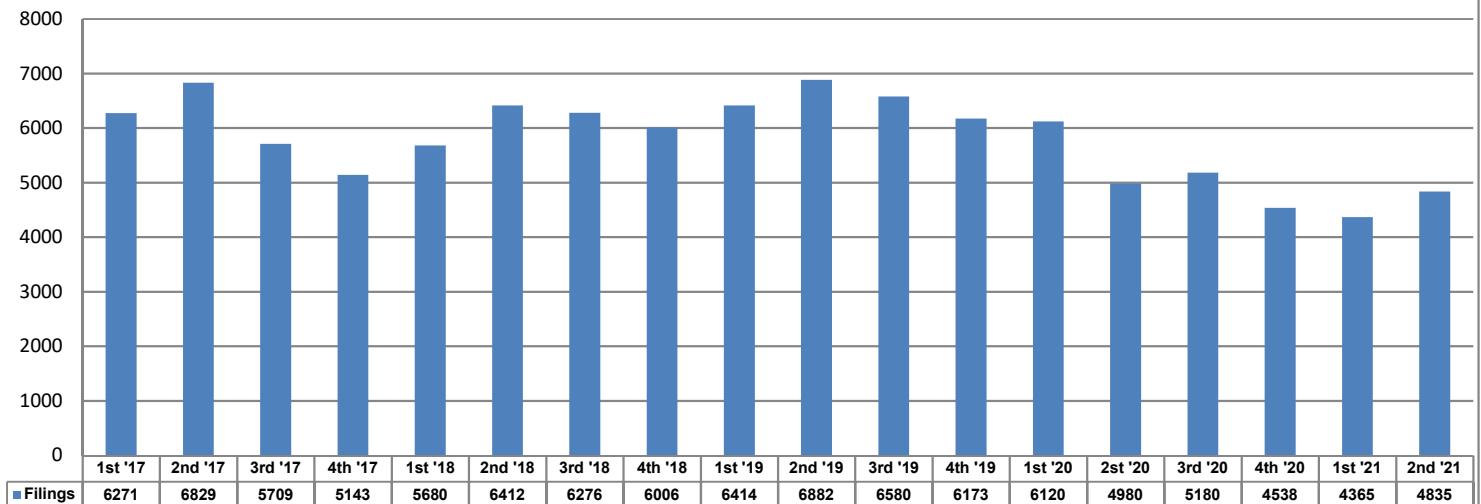
United States Bankruptcy Court - Middle District of Florida
Updated July 19, 2021 Meeting Data and Information
Statistics as of June 30, 2021

Annual Filings

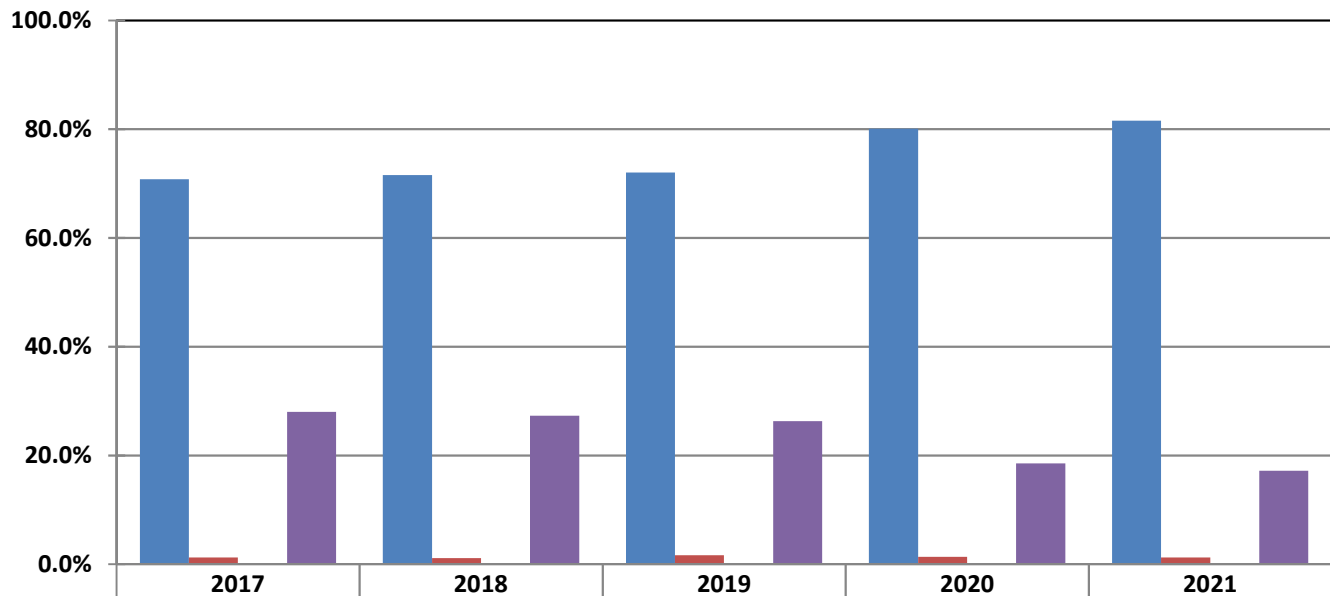


Year	Annual Filings	vs. 2015	vs. Prior Yr.
2017	23957		
2018	24506	2%	2%
2019	26505	11%	8%
2020	20816	-13%	-21%
*2021	19340	-19%	-7%

Filings by Quarter

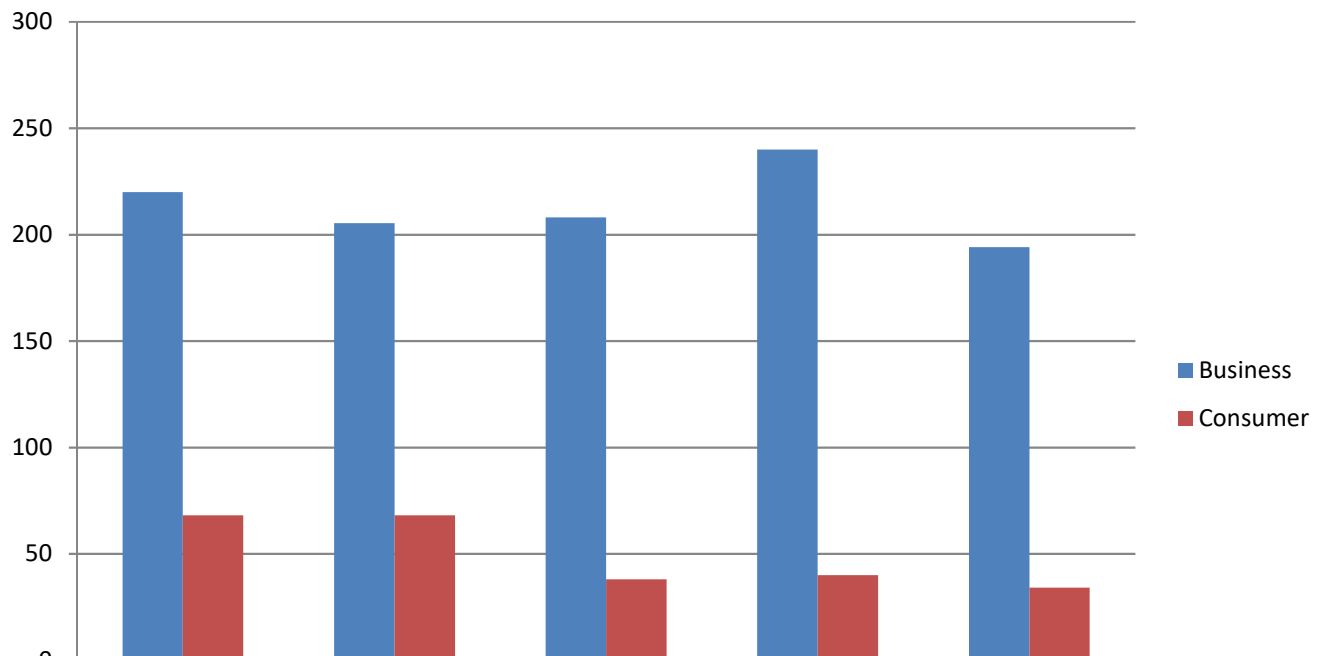


Filings by % of Chapter Type



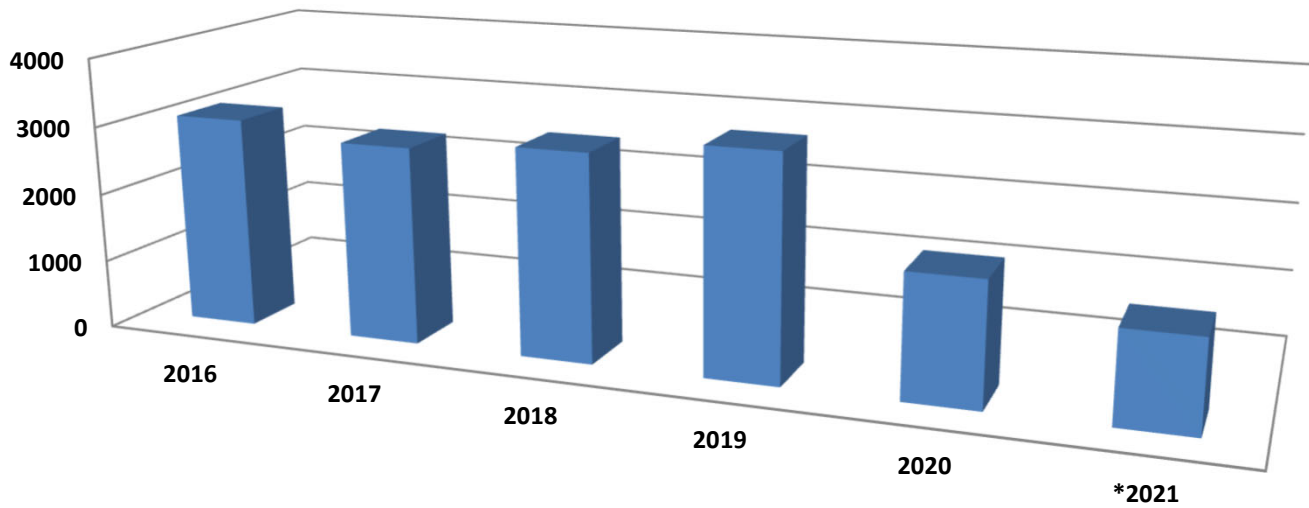
Chapter 7	70.8%	71.6%	72.0%	80.1%	81.5%
Chapter 11	1.2%	1.1%	1.7%	1.4%	1.2%
Chapter 12	0.0%	0.0%	0.0%	0.0%	0.0%
Chapter 13	28.0%	27.3%	26.3%	18.5%	17.2%

Chapter 11 Filings



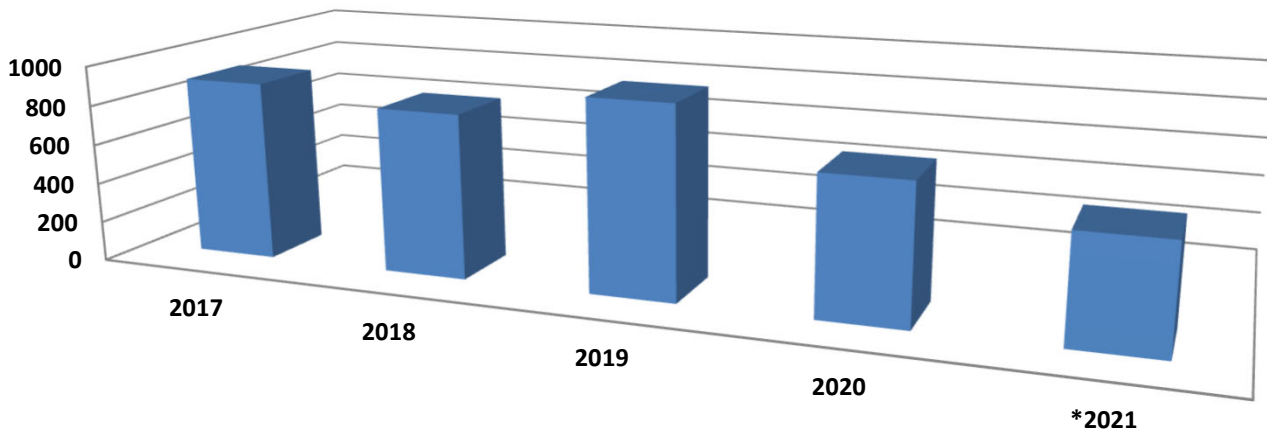
Business	220	205	208	240	194
Consumer	68	68	38	40	34

Pro Se Filings



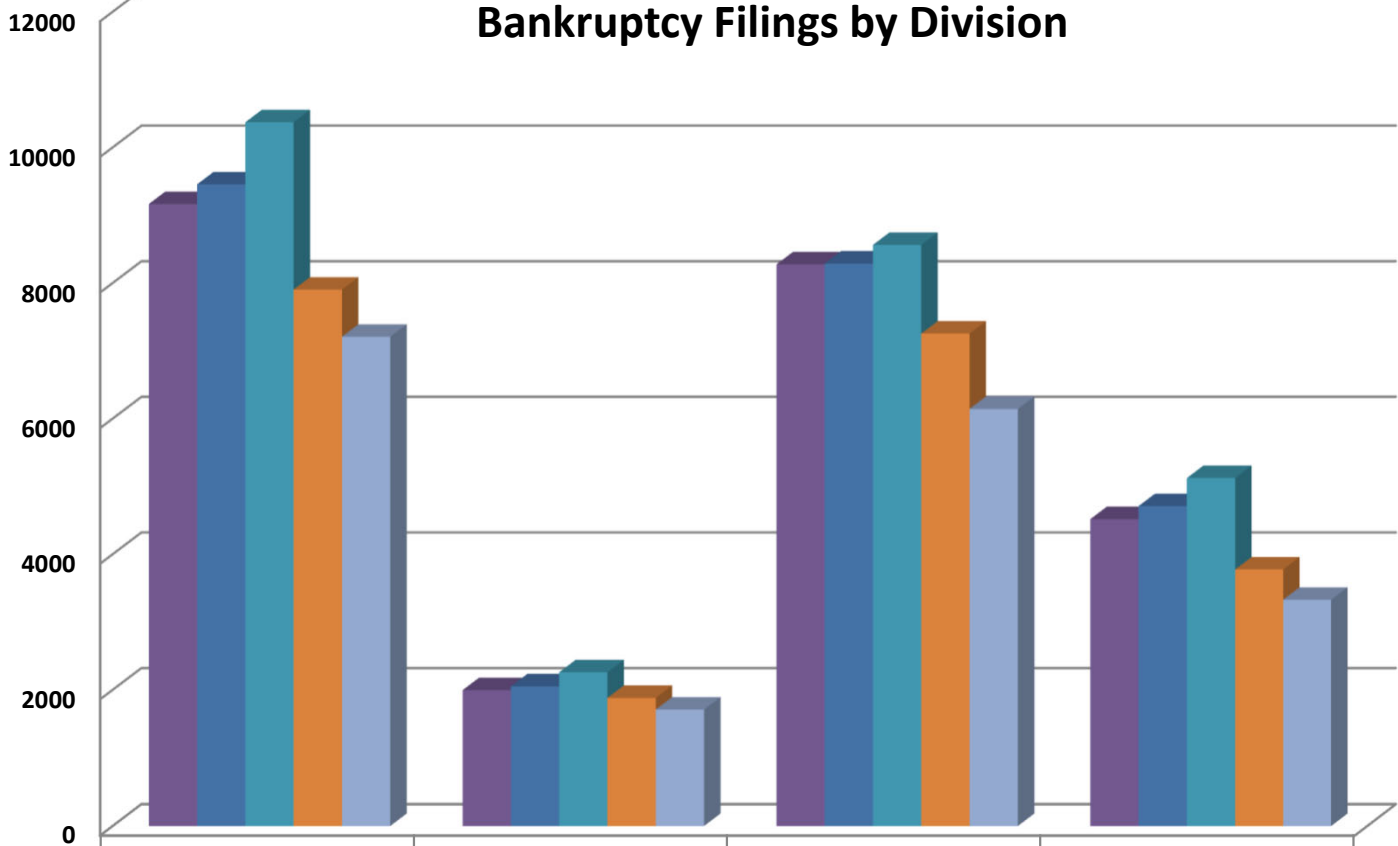
	2016	2017	2018	2019	2020	*2021
Pro Se	3079	2868	3006	3232	1779	1316
% of All Filings	13%	12%	12%	12%	9%	7%

In Forma Pauperis Filings



	2017	2018	2019	2020	*2021
IFP Granted	903	825	956	691	534
% of All Filings	4%	3%	4%	3%	3%

Bankruptcy Filings by Division



Note: Counts include reopen cases

Order Granting IFP counts have been corrected to include approving language.