

Forms are generic suggestions. Parties and their attorneys should revise them to address their unique circumstances of each case.

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
DIVISION
-
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In re:

Case No. D: YY-bk-00000-XXX
Chapter 11

John Doe,

Debtor.*

/

**DEBTOR'S MOTION TO REOPEN ADMINISTRATIVELY CLOSED
INDIVIDUAL CHAPTER 11 CASE TO OBTAIN DISCHARGE AND FINAL DECREE**

**NOTICE OF OPPORTUNITY TO
OBJECT AND REQUEST FOR HEARING**

Pursuant to Local Rule 2002-4, the Court will consider the relief requested in this paper without further notice or hearing unless a party in interest files a response within 21 days from the date set forth on the attached proof of service, plus an additional three days for service if any party was served by U.S. Mail.

If you object to the relief requested in this paper, you must file a response with the Clerk of the Court at [address] and serve a copy on the movant's attorney, [name and address], and any other appropriate persons within the time allowed. If you file and serve a response within the time permitted, the Court will either schedule and notify you of a hearing or consider the response and grant or deny the relief requested without a hearing.

If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

Debtor, John Doe, files this Motion to Administratively Reopen Individual Chapter 11

Case to Obtain Discharge and Final Decree (the "Motion"). In support, Debtor states:

*All references to "Debtor" include and refer to both debtors in a case filed jointly by two individuals.

1. On [INSERT DATE], the Court entered an Order Confirming Chapter 11 Plan (Doc. No. **XX**) (the “Confirmation Order”), which confirmed Debtor’s Plan of Reorganization (Doc. No. **XX**) (the “Confirmed Plan”).

2. On [INSERT DATE], the Court entered an Order Granting Debtor’s Motion to Administratively Close Individual Chapter 11 Case (Doc. No. **XX**).

3. As evidenced by the attached detailed accounting, Debtor has now completed all payments called for under the Confirmed Plan and Confirmation Order.

4. Having completed all plan payments, Debtor now is eligible for discharge under 11 U.S.C. § 1141(d)(5)(A).

5. There is no reasonable cause to believe that 11 U.S.C. § 522(q)(1) is applicable to Debtor or that there is any pending proceeding in which Debtor may be found guilty of a felony of the kind described in 11 U.S.C. § 522(q)(1)(A) or liable for a debt of the kind described in 11 U.S.C. § 522(q)(1)(B).

6. Pursuant to Fed. R. Bankr. P. 1007(b)(7)(B), the undersigned represents that 11 U.S.C. § 1141(d)(3) is not applicable to Debtor or Debtor has filed a statement of completion of the personal financial management course.

WHEREFORE, Debtor respectfully requests that this Court (1) grant this Motion and administratively reopen this case, (2) enter a discharge of Debtor, (3) enter a Final Decree closing this individual Chapter 11 case, and (4) grant such other and further relief as the Court deems appropriate.