

FORMS ARE GENERIC SUGGESTIONS. PARTIES AND THEIR ATTORNEYS SHOULD REVISE THEM TO ADDRESS THE UNIQUE CIRCUMSTANCES OF EACH CASE.

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
____ DIVISION
www.flmb.uscourts.gov

In re _____,
Debtor*.

)
)
) Case No. ___-bk-___-___
) Chapter _
)
)

MOTION TO DECLARE SECURED CLAIM SATISFIED AND LIEN RELEASED
(Chapter 12 or 13 Cases Only)

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

If you object to the relief requested in this paper you must file a response with the Clerk of Court at (address) [and, if the moving party is not represented by an attorney, mail a copy to the moving party at (address)] within (number) days from the date of the attached proof of service, plus an additional three days if this paper was served on any party by U.S. Mail.

If you file and serve a response within the time permitted, the Court will either notify you of a hearing date or the Court will consider the response and grant or deny the relief requested in this paper 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, and the Court may grant or deny the relief requested without further notice or hearing. You should read these papers carefully and discuss them with your attorney if you have one. If the paper is an objection to your claim in this bankruptcy case, your claim may be reduced, modified, or eliminated if you do not timely file and serve a response.

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

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Debtor, [insert name of Debtor] requests entry of an order declaring creditor's claim satisfied and directing creditor to release its lien and states as follows:

1. Debtor filed this Chapter ____ bankruptcy case on [insert petition date].
2. Creditor [insert name of Creditor] holds a secured claim created by the recording of a [describe security, i.e. mortgage, lien] on [date of recording] at [O.R. Book xxx, Page xxx or Document No. xxx], of the [Public Records of {County, State}] or [describe where lien is recorded] (the "Lien") that encumbers the Debtor's property described as: [describe the property].
3. On _____, 20__, the Court entered an order confirming the Debtor's plan (Doc. No. [insert document number]) which provided to pay Creditor's secured claim.
4. Debtor has completed the plan payments. Creditor's secured claim has been satisfied and Creditor should release the Lien.

WHEREFORE, Debtor respectfully requests that the Court enter an order granting this motion, declaring the Secured Creditor's claim is satisfied, directing Secured Creditor to release the Lien, and for such further relief as the Court deems appropriate.

Dated: [insert date].

/s/ Signature
Attorney Name
Attorney Bar No.
Attorney E-Mail
Attorney Address
Attorney Phone Number
Attorney for [insert name of client]

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PROOF OF SERVICE

A true and correct copy of the foregoing has been sent by either electronic transmission or U.S. Mail on _____ to:

/s/ Signature
Attorney Name
Attorney Bar No.
Attorney E-Mail
Attorney Address
Attorney Phone Number
Attorney for [insert name of client]