

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
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In re _____)
)
,) Case No. ____: ____ bk- ____ - ____
) Chapter
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**

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.

Debtor(s), [insert debtor(s) name(s)], file(s) this Motion to Administratively Reopen Individual Chapter 11 Case to Obtain Discharge and Final Decree (the “Motion”). In support, Debtor(s) state(s):

* All references to “Debtor” shall refer to both debtors in a case filed jointly by two individuals.

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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, the Debtor(s) [has/have] now completed all payments called for under the Confirmed Plan and Confirmation Order.

4. Having completed all plan payments, the Debtor(s) now [is/are] 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(s) or that there is any pending proceeding in which Debtor(s) 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(s) or Debtor(s) [has/have] filed a statement of completion of the personal financial management course.

WHEREFORE, Debtor(s) 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.

Dated: [insert date].

/s/ Signature
Attorney Name

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Attorney Bar No.
Attorney E-Mail
Attorney Address
Attorney Phone
Number Attorney for
Debtor(s)

DEBTOR VERIFICATION STATEMENT AND SIGNATURE

I [insert debtor name] declare (or certify, verify, or state) under penalty of perjury [if executed outside the U.S., include the ‘under the laws of the Unites States of America’] that the foregoing is true and correct. Executed on [insert date].

/s/ Debtor Signature
[insert debtor name]

PROOF OF SERVICE

A true and correct copy of the foregoing has been sent by either electronic transmission or U.S. Mail on_____, to: All creditors and interested parties as listed on attached matrix [be sure to add the matrix].

/s/ Signature
Attorney Name
Attorney Bar No.
Attorney E-Mail
Attorney Address
Attorney Phone
Number Attorney for
Debtor(s)