

**MOTIONS FOR RELIEF FILED IN JUDGE MULLINS'
OR JUDGE MASSEY'S COURT**

THE FOLLOWING LANGUAGE SATISFIES THE TRUSTEE'S OBJECTION TO THE MOTION TO LIFT THE AUTOMATIC STAY IN CASES WHERE THE DEBTOR HAS SIGNIFICANT EQUITY THAT COULD BE REALIZED BY THE UNSECURED CREDITORS.

THIS LANGUAGE WOULD FOLLOW THE 10 DAY DEFAULT LANGUAGE IN THE ORDER and BEFORE YOUR REMEDY LANGUAGE.

In the event of the Debtor's failure to cure any such default of this Consent Order, Movant agrees to provide the Chapter 13 Trustee with twenty (20) days notice of the Debtor's failure to cure said default. During said twenty (20) day period the Trustee may file a motion to convert the case to a Chapter 7 or she may file a motion to sell the subject property. If a motion to convert or a motion to sell the property is not filed within the aforementioned twenty (20) day period, the mortgager holder may be entitled to an Order from this Court lifting the automatic.