

**EQUITY LANGUAGE TO INCLUDE IN APPLICABLE ORDERS ON  
MOTIONS TO LIFT THE AUTOMATIC STAY**

THE TRUSTEE REQUESTS THE FOLLOWING LANGUAGE BE INCLUDED IN ANY CONSENT ORDER ON A MOTION TO LIFT THE AUTOMATIC STAY WHERE THE SUBJECT COLLATERAL HAS SIGNIFICANT UNEXEMPT EQUITY THAT COULD BE REALIZED BY UNSECURED CREDITORS.

*“In the event of the Debtor’s failure to cure a default under 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. If a motion to convert is not filed within the aforementioned twenty (20) day period, the Movant may be entitled to an Order from this Court lifting the automatic.”*