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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH

<p>In Re:</p> <p>KYLE REED PETERSON STEPHANIE ANN PETERSON, Debtors.</p>	<p>Bankruptcy No. 15-22951</p> <p>Chapter 13</p> <p>Judge Joel T. Marker</p>
<p>OBJECTION TO MOTION TO DISMISS, MOTION TO ABATE PAYMENTS, AND MOTION TO MODIFY CONFIRMED PLAN</p>	

COME NOW Kyle Reed Peterson and Stephanie Ann Peterson ("Debtors"), by and through counsel, and hereby object to the Trustee's September 17, 2015 motion to dismiss for non-compliance with confirmation order; request abatement of their delinquent Chapter 13 plan payments in the amount of \$2,350.00; and request modification of their confirmed Chapter 13 Plan. Grounds and bases for this objection are as follows:

1. Mr. and Mrs. Peterson have separated and are now maintaining two households. As a result, the Debtors fell behind on their \$470.00 Chapter 13 plan payments.
2. The Debtors are working to curtail their expenses and will therefore be able to make their ongoing Chapter 13 plan payments and accommodate a modest increase in their ongoing plan payment to account for the \$2,350.00 delinquency.
3. The case should therefore not be dismissed.
4. The Debtors will make their November 2015 plan payment in the amount of \$470.00.

5. The Debtors request an abatement of their delinquent payments in the amount of \$2,350.00 and a modification of their future, ongoing payments beginning with the December 2015 plan payment to allow the amount of their delinquency to be spread evenly over the life of their remaining plan payments.

6. Counsel requests approval of \$550.00 in attorney fees and costs, which have been paid by the Debtors.

WHEREFORE, the Debtors respectfully request that the Court deny the Trustee's motion to dismiss; that the Court grant the Debtors' motion to abate \$2,350.00 in payments; that the Court grant the Debtors' motion to modify their confirmed Chapter 13 plan; that the Court approve \$550.00 in fees and costs; and that the Court grant such other and further relief as the Court deems just and proper.

Dated: October 13, 2015.

/s/ Laura Ferrin
Laura Ferrin, of and for
Law Offices of Laura Ferrin, P.C.
Attorney for the Debtors

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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH

In Re: KYLE REED PETERSON STEPHANIE ANN PETERSON, Debtors.	Bankruptcy No. 15-22951 Chapter 13 Judge Joel T. Marker
NOTICE OF OBJECTION TO MOTION TO DISMISS, OF MOTION TO ABATE PAYMENTS, AND OF MOTION TO MODIFY CONFIRMED PLAN AND NOTICE OF OPPORTUNITY FOR HEARING Objection Deadline: November 6, 2015 Hearing Date & Time: November 18, 2015 at 9:30 a.m.	

PLEASE TAKE NOTICE that Debtor Kyle Reed Peterson and Debtor Stephanie Ann Peterson ("Debtors"), by and through their attorney, have filed with the United States Bankruptcy Court for the District of Utah an Objection to Motion to Dismiss, Motion to Abate Payments, and Motion to Modify Confirmed Plan (hereinafter referred to as the "Objection and Motions").

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

Specifically, through their Motions, the Debtors request abatement of their \$2,350.00 plan payment delinquency, and a denial of the Trustee's Motion to Dismiss, such that their plan payments beginning with the December 2015 plan payment will be modified to account for the \$2,350.00 delinquency as needed. Counsel also requests approval of attorney fees and costs in the amount of \$550.00, already paid by the Debtors.

NO HEARING WILL BE CONDUCTED ON THIS OBJECTION TO MOTION TO DISMISS, MOTION TO ABATE PAYMENTS, and MOTION TO MODIFY CONFIRMED PLAN UNLESS A WRITTEN RESPONSE OR OBJECTION IS FILED WITH THE CLERK OF THE COURT ON OR BEFORE THE OBJECTION DEADLINE SET FORTH BELOW:

If you do not want the Court to grant the relief requested in the Debtors' Objection and Motions, then you or your attorney must:

- (1) On or before November 6, 2015, file with the Bankruptcy Court a written response, explaining your position, at:

United States Bankruptcy Court
350 South Main Street, Room 301
Salt Lake City, Utah 84101

If you mail your objection to the Bankruptcy Court for filing, you must mail it early enough so that the Court will receive it on or before November 6, 2015. You must also mail a copy to the undersigned counsel at:

Law Offices of Laura Ferrin, PC
299 S. Main Street, Suite 1300
Salt Lake City, UT 84111

- (2) And attend a hearing on November 18, 2015 at 9:30 a.m. in Courtroom 341, United States Bankruptcy Court, 350 South Main Street, Salt Lake City, Utah, 84101. **There will be no further notice of the hearing,** and failure to attend the hearing will be deemed a waiver of your objection or response.

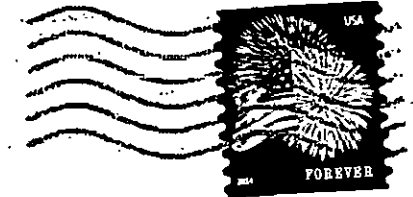
If you or your attorney do not take these steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Debtors' Objection and Motions and may enter an order granting that relief. In the absence of a timely filed objection or response, the undersigned counsel may and will ask the Court to enter an order approving the Objection and Motions without a hearing.

Dated: October 13, 2015.

/s/ Laura Ferrin
Laura Ferrin, of and for
Law Offices of Laura Ferrin, P.C.
Attorney for the Debtors

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