

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re: _____ §
_____ § Bankruptcy Case No. 0__ - _____ -H__ -13
_____ §
Debtor(s). _____ §

**DEBTORS CERTIFICATION,
MOTION FOR ENTRY OF CHAPTER 13 DISCHARGE
AND PROPOSED DISCHARGE ORDER
THIS MOTION SEEKS AN ORDER DISCHARGING THE
DEBTORS PURSUANT TO § 1328(a) OF THE BANKRUPTCY
CODE. IF YOU OPPOSE THE MOTION, YOU MUST FILE AN
OBJECTION WITHIN 20 DAYS OF THE DATE LISTED BELOW
IN THE CERTIFICATE OF SERVICE. YOUR OBJECTION MUST
SET FORTH THE SPECIFIC FACTUAL ALLEGATIONS WITH
WHICH YOU DISAGREE. IF NO TIMELY OBJECTION IS
FILED, THE COURT MAY GRANT THE RELIEF.**

The Debtors move for entry of a discharge under § 1328(a) of the Bankruptcy Code.

1. By signing below, the Debtors certify under penalty of perjury under the laws of the United States of America that the following statements are true and correct:

A. We have completed the personal financial management instructional course from an agency approved by the United States Trustee. A copy of Official Form 23 is attached.

B. If I owe a debt arising from (a) any violation of any state or federal securities laws, regulations or orders; (b) fraud, deceit or manipulation in a fiduciary capacity or in connection with the purchase or sale of any security; (c) a civil remedy under § 1964 of title 18; or (d) a criminal act, intentional tort, or willful or reckless misconduct that caused serious physical injury or death to another individual in the preceding 5 years, then I have not claimed an exemption for my residence in an amount in excess of \$125,000.

C. All amounts payable by me on a domestic support obligation, that are due through this date (including amounts due before the petition was filed in this case, but only to the extent provided for by

the plan) have been paid;

D. I have not received a discharge in a case filed under chapter 7, 11 or 12 of the Bankruptcy Code during the four-year period before the date that my petition was filed in this case;

E. I have not received a discharge in a case filed under chapter 13 of the Bankruptcy Code during the two-year period before the date that my petition was filed in this case;

F. No criminal proceeding is pending against me alleging that I am guilty of a felony; and

G. No civil case is pending against me alleging that I am liable for any (a) violation of the Federal securities laws, any State securities law, or any regulation or order issued under Federal securities laws or State securities laws; (b) fraud, deceit or manipulation in a fiduciary capacity or in connection with the purchase or sale of any security; (c) civil remedy under § 1964 of title 18; or (d) criminal act, intentional tort, or willful or reckless misconduct that caused serious physical injury or death to another individual in the preceding 5 years.

2. I have made all payments required by my confirmed chapter 13 plan.

Date

/s/ _____
Debtor

Date

/s/ _____
Joint Debtor

Respectfully Submitted,

Date

/s/ Alexander B. Wathen
Alexander B. Wathen
Attorney for Debtor(s)
Texas Bar No. 24005122
S.D. Tex. No. 22793
10333 Northwest Freeway, Suite 503
Houston, TX 77092
Ph. (281) 999-9025

CERTIFICATE OF SERVICE

I certify that on _____, I have or am contemporaneously serving a copy of these documents with all attachments on those entities listed below either by first class mail or through the Clerk by electronic mail.

_____ /s/ Alexander B. Wathen _____
Date Alexander B. Wathen

BY ELECTRONIC MEANS THROUGH THE CLERK OR BY FIRST CLASS MAIL:

Chapter 13 Trustee
U.S. Trustee and Any entity receiving ECF notices

A separate certificate of service will be filed for the other creditors.
