UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
_____ DIVISION

In re:

DEBTOR'S NAME,

Debtor.
_____/

Case No. xx-xxxxx-xxx

Chapter 13

DEBTOR'S CERTIFICATE OF COMPLIANCE AND MOTION FOR ISSUANCE OF DISCHARGE BEFORE COMPLETION OF PLAN PAYMENTS

[Name], the debtor in this chapter 13 case, moves under 11 U.S.C. § 1328(b) for entry of a discharge before completion of plan payments, and certifies as follows:

1. I am unable to complete the payments under the confirmed plan due to the following circumstances for which the debtor should not justly be held accountable: [Insert explanation].

2. The value, as of the effective date of the plan, of property actually distributed under the plan on account of each allowed unsecured claim is not less than the amount that would have been paid on such claim if the estate of the debtor had been liquidated under chapter 7 of the Bankruptcy Code on such date. [Insert explanation].

3. Modification of the plan under 11 U.S.C. § 1329 is not practicable because [insert explanation].

4. The debtor has completed an instructional course concerning personal financial management described in 11 U.S.C. § 111 and filed proof of completion of the course with the Court on [date].

5. Statement under Fed. R. Bankr. P. 1007(b)(8) (check one):

   _____ a. The debtor has not claimed an exemption under 11 U.S.C. § 522(b)(3)(A) in property described in subparagraphs (A), (B), (C), and (D) of 11 U.S.C. § 522(p)(1) that exceeds $189,050.[1]

   _____ b. The debtor has claimed an exemption under 11 U.S.C. § 522(b)(3)(A) in property described in subparagraphs (A), (B), (C), and (D) of 11 U.S.C. § 522(p)(1) that exceeds $189,050,[2] but

[1] Under 11 U.S.C. § 104(a), this is the amount that was in effect for cases filed after April 1, 2022 but before March 31, 2025.

there is no pending proceeding in which the debtor 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. The debtor has not received a discharge in a case filed under chapter 7, 11, or 12 of the Bankruptcy Code during the 4-year period preceding the date of the order for relief under chapter 13 of the Bankruptcy Code in this case, or in a case filed under chapter 13 of the Bankruptcy Code during the 2-year period preceding the date of such order.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: _____
Date

_____
Debtor's signature

_____
Joint debtor's signature (if applicable)

[Under Local Rules 2002-1(b)(6) and 4004-3(b), the debtor's attorney must serve this document on the chapter 13 trustee, all creditors, and all indenture trustees, and must include at the end of this document a certificate of service, as required by Local Rule 9036-2. If the debtor is unrepresented, the Clerk will serve this document nder Local Rule 2002-1(a)(3).]