

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

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In re: Naomi L. Gonzalez)
)
)
 Debtor(s))
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Chapter 13
Case No. 14-41138-MSH

MOTION AND AGREED ORDER TO EXTEND TIME FOR CHAPTER 13 TRUSTEE TO FILE OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN AND EXEMPTIONS

Denise M. Pappalardo, the Standing Chapter 13 Trustee (the "Trustee") and the Debtor(s) hereby move that this Court extend the deadline for the Trustee to file an Objection to Confirmation of the Chapter 13 Plan and Exemptions to AUG. 29, 2014. As grounds therefore, the parties state the following:

1. The Debtor(s) will produce the following documents to the Trustee on or before _____
Copies of Federal Tax Returns each year during
the pendency of the Plan

2. The Debtor(s) shall file the following on or before _____, 20____.
____ Amended Plan _____ DSO/Tax Affidavit
____ Amended Schedules _____
____ Other _____

3. In the event of a default on terms of this Motion and Order, it is agreed that upon the Trustee filing a Certificate of Non-Compliance, on seven (7) days notice to the Debtor(s) and Debtor's attorney, this case may be dismissed without further Order or hearing of the Court.

WHEREFORE, the Trustee and the Debtor request that the within Motion and Order be allowed.

[Signature] Chapter 13 Trustee [Signature] Attorney for Debtor(s) [Signature] Debtor(s)
David R. Chenelle, Esq. Naomi Gonzalez

SO ORDERED: [Signature] 06/30/2014 Dated
U.S. Bankruptcy Judge