

A few takeaways from the December 20 Chapter 13 day with Judge Slade.

- 1) He would not confirm any plan on less than seven days' notice. Get your amendments on file early. Even if I think the plan is OK, per his instructions to me, I will put the case on the continued list if the plan was filed six or fewer days before the hearing.

- 2) He is likely to have questions about motions to incur debt so answer them in advance in your motion.
 - a. Why is this necessary?
 - b. Why is this deal in the debtor's best interest?
 - c. Is this the best deal the debtor could find?
 - d. Does this deal impair the debtor's ability to make plan payments?
 - e. Where is the amended I / J showing that the plan remains feasible?

- 3) He is likely to have questions about motions to defer default so answer them in your motion.
 - a. How did the debtor fall behind?
 - b. Why should they be excused?
 - c. If there is a change in circumstances, describe it and file the appropriate amended Schedules.
 - d. Is the plan still feasible?