

FILED

JUL 26 2005

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA
GRANT PRICE
CLERK, U.S. BANKRUPTCY COURT
WESTERN DISTRICT OF OKLAHOMA
BY: _____ DEPUTY

IN RE: EDWARD ALAN REED,)
)
Debtor)

Case No. 04-20915-NLJ
Chapter 13

DEBTOR'S MOTION TO MODIFY CHAPTER 13 PLAN

COMES NOW the Debtor, Edward Alan Reed, and for his Motion to Modify Chapter 13 Plan states as follows:

1. The 2001 GMC Sonoma will require extensive repairs and it is not economically feasible to retain the vehicle.
2. In the best interest of the creditors and the debtor, Debtor requests that his Chapter 13 Plan be modified in the following particulars:
 - a. That the 2001 GMC Sonoma be surrendered to Bank of Oklahoma with a deficiency allowed.
 - b. That the term of the plan be reduced to 36 months.
 - c. That the monthly plan payment remain at \$630.00 per month.
 - d. That additional attorney fees of \$250.00 be approved for bringing this Motion.

WHEREFORE PREMISES CONSIDERED, Debtor requests that the Chapter 13 Plan modified as provided herein.

Respectfully submitted,



Howard R. Haralson, OBA No. 11648
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405/789-2000
Attorney for Debtor

CERTIFICATE OF MAILING

I hereby certify that on this 26th day of July, 2005, I mailed, postage prepaid, a true and correct copy of the above foregoing to:

John T. Hardeman, Trustee
P.O. Box 1948
Oklahoma City, OK 73101

David O. Beal
Attorney for Bank of Oklahoma, N.A.
P.O. Box 32738
Oklahoma City, OK 73123

and all creditors on the attached mailing matrix.

Howard R. Hardeman