

**THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO**

IN RE:

)
) **CHAPTER 13**
) **CASE NO:**
)
) **MARILYN SHEA-STONUM**
) **BANKRUPTCY JUDGE**
)
Debtor(s))

**AGREED ENTRY FOR ADEQUATE PROTECTION PAYMENTS TO BE
MADE BY THE CHAPTER 13 TRUSTEE PRIOR TO CONFIRMATION
PURSUANT TO 11 U.S.C. SECTION 1326**

Now comes Keith L. Rucinski, Chapter 13 Trustee, by and through undersigned counsel and the debtor(s), in this case, by and through undersigned counsel, and hereby agree to have the Chapter 13 Trustee make adequate protection payments prior to confirmation to the following creditors:

CHAPTER 13
 Keith L Rucinski
 Trustee
 One Cascade Plaza
 Suite 2020
 Akron, Oh 44308
 (330) 762-6335
 Fax
 (330) 762-7072
 Email
 krucinski@ch13akron.com

Creditor and Collateral	Account #	Address	Amount

- 1) The plan was filed on _____.
- 2) The debtor(s) shall make their first payment to the Trustee by no later than 20 days from the above filing date in the amount of \$ _____. Thereafter, the debtor must make payments to the Trustee by the 20th of each month.
- 3) The Trustee shall offset any claims the above creditor(s) may file by the amount of the adequate protection payments.
- 4) The Trustee will begin paying the above creditor(s) the first adequate protection payments the last business day of the month following the filing date.
- 5) The Trustee shall be allowed the ordinary and customary Trustee fee on adequate protection payments made to creditors prior to confirmation.
- 6) The Trustee will cease making the adequate protection payments as soon as the plan is confirmed or this case is dismissed or converted.
- 7) The Trustee shall have no liability for failure to make adequate protection payments based on the failure of the debtor to make timely payments to the Trustee or into the Chapter 13 plan.
- 8) If a creditor, who is the subject of this order, objects to the adequate protection payments detailed in this order, the creditor shall file an objection to this agreed entry with the U.S. Bankruptcy Court in Akron, Ohio, within 20 days of the date on this agreed entry.
- 9) Pursuant to 11 U.S.C. Section 102, if no party in interest requests a hearing on this agreed entry, the Chapter 13 Trustee is authorized and directed to make adequate protection payments to the creditor(s) as detailed in this order.

###

BE IT SO ORDERED:

Approved by:

 Keith Rucinski
 Chapter 13 Trustee
 Ohio Reg. No. 0063137
 One Cascade Plaza, #2020
 Akron, Ohio 44308
 Phone: 330-762-6335, ext. 223
 Fax: 330-762-7072

 Attorney for the debtor(s)

krucinski@ch13akron.com

cc: Debtor(s) Attorney -

Creditor -

CHAPTER 13

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