CHAPTER 13 QUARTERLY NEWSLETTER
DECEMBER 2025

1. SEASONS GREETINGS AND BEST WISHES FOR A HAPPY NEW YEAR

During 2025, the number of bankruptcy filings continued to show a steady increase in the number of people needing bankruptcy relief.

Attorneys will continue to face challenges and unique issues in addressing the needs of their clients. However, the local bankruptcy bar in Northeast Ohio is both resilient and dedicated to meeting the needs of their clients.

The Chapter 13 office wishes everyone best wishes for the holiday season and new year!

To allow the Chapter 13 staff to spend time with their families please note that the Chapter 13 office will be closed on December 24, December 25, December 26, 2025, and January 1, 2026.

2. UPDATED BONUS AGREED ENTRY

Traditionally, the Chapter 13 Trustee in Akron has split the net amount (after tax) bonus funds with the debtors. The funds paid in from bonuses are used to increase the unsecured dividend. The remaining funds sent to the debtor was left to the debtor's discretion. The Trustee will continue the practice of splitting the net bonus funds between the debtor and creditor as this has been a beneficial practice for both debtor and creditors over the years.

However, it is necessary for the standard bonus agreed entry used by the Trustee to be updated to reflect current language used by employers. Employers have begun to not use the generic term "bonus" but have used other terms such as "gainshare, incentives, commissions, or other lump sum distribution".

The standard agreed entry for bonus funds used by the Trustee in Akron has been updated to reflect the current terms used by employers.

Attached to this newsletter is a copy of the new agreed entry for turnover of bonus funds and other lump sum distributions which will be used by the Chapter 13 Trustee effective immediately.

3. ADDITIONAL NOTICE TO REAL PROPERTY CREDITORS – OFFICIAL FORM 410C13-N

Pursuant to Rule 3002.1(g)(1), effective December 1, 2025, real property creditors will receive notice of funds paid through the Chapter 13 plan on conduit mortgages. The official name of the form is titled "Trustee's Notice of Disbursements Made".

A copy of the official form, Trustee's Notice of Disbursements Made, is attached to this newsletter for counsel to review.

This form will be filed when the debtor completes payments under the plan and a Request for Discharge has been filed by the Trustee.

4. NEW REQUEST FOR DISCHARGE

To be consistent with the Notice of Disbursements Made, the Request for Discharge form used in Akron has been updated.

Generally, the information in the Request for Discharge is the same as the previous version, but the revised form puts real property creditors on notice that the Notice of Disbursements Made form that is also required to be filed.

The Request for Discharge and Notice of Disbursements Made will be filed by the Chapter 13 office at the same time.

It is the responsibility of the real property creditors to review their records and to file an appropriate response whether or not they are in agreement with the information provided by the Trustee.

5. NEW MEANS TEST NUMBERS

The numbers for the means test have been updated in November 2025. Counsel should review information in their software to make sure they are using the most updated numbers.

Attached to this newsletter is a summary of the updated means test numbers.

6. ALL PARTIES MUST USE PORTAL TO DELIVER DOCUMENTS

Nationally, various forms of computer viruses and other cyber security issues have been affecting many parties.

To continue best practice, the Chapter 13 office in Akron will no longer accept, open, or respond to attachments sent by email.

All parties must use the Trustee's Bankruptcy Documents portal system which provides extra cyber protection and additionally, greater privacy for all parties.

Please remember email is not a secure form of communication.

Please find attached to this newsletter instructions on using the portal.

There are new forms added to Bankruptcy Documents for Order uploads. One for creditor orders and one for debtor attorney orders when submitting orders which need attention by the Chapter 13 office.

For law firms with more than one counsel, a portal account can be set up and used for the law firm, and it would not be necessary to set up multiple accounts for parties within the same firm.

Although this is an extra step, please remember that viruses continue to evolve and can be encrypted into everyday documents. This extra step is meant to help all parties mitigate a cyber-attack.

7. MOTIONS TO DISMISS FOR FAILURE TO TURNOVER TAX RETURNS

Counsel and their clients have begun to see motions to dismiss for the debtor's failure to turnover tax returns. The Chapter 13 Trustee in Akron requires tax return copies on all cases every year the parties are in the program. The motions to dismiss being filed on cases for failure to turnover tax returns is after the debtor has received 2 courtesy notices by the Chapter 13 office, a motion and order to turnover said tax returns, and finally the motion to dismiss. The Trustee would prefer not to dismiss cases for the failure to turnover tax returns, but debtors cannot ignore this important part of their obligations under the Chapter 13 plan.

As a new tax season will be quickly upon us, the Trustee asks all counsel to remind their clients that their tax returns must be submitted to the Chapter 13 office for review.

8. MULTIPLE 341 MEETINGS

As some counsel are now aware, the Chapter 13 office has been requiring more than one 341 meeting in some cases. Although there are no parties that like multiple 341 meetings for the same case, including the Chapter 13 Trustee, it has become necessary to have said meetings when proper documentation has not been provided prior to the meeting. Please remember that the following information (ALL PAGES) must be provided for the following:

Bank Statements-prior three months of statements for all accounts
Tax Returns-prior two year of tax returns
Car Insurance-for all vehicles in plan
House Insurance
Picture Identification and Proof of Social Security Number

Please note that said items must be uploaded to the Chapter 13 portal a minimum of 5 days prior to the 341 meeting. As a refresher, information on how to load items to the portal can be found attached to this newsletter.

9. COUNSEL NEED TO REVIEW THEIR EQUITY CALCULATION

The Chapter 13 office has noted that some counsel chose the exemption which states:

100% of fair market value, up to any statutory limit

When this is selected, often software used by counsel picks that amount up as zero and creates equity in the Chapter 13 plan when perhaps there is no equity at all.

To resolve this issue, the Trustee encourages counsel to put the dollar amount of the equity and not to use this option which could cause equity to be reflected in the Chapter 13 plan.

10. CHANGE IN INTEREST RATES

Effective December 10, 2025, the Federal Reserve reduced the prime interest rate to 6.75%.

Therefore, allowing for a 2% risk factor, Chapter 13 plans going forward should reflect a Till interest rate of 8.75%.

As there may be further changes in upcoming interest rates, please remember that the Chapter 13 website has a link to a listing of federal prime rates by the Wall Street Journal. Said link can be found on the attorney page of the Chapter 13 home page at www.chapter13info.com.

11. PERSONAL FINANCIAL MANAGEMENT COURSE

The Chapter 13 office will continue to sponsor an on-line Personal Financial Management Course through the Trustee Education Network. Information regarding the online program is available on the Chapter 13 website at www.chapter13info.com. There is no charge to take the course online for Chapter 13 debtors who have filed in Akron, Ohio.

Please note: in a joint case, each debtor must take the on-line course separately and use two different e-mails. The software program generates the required certificates of completion partly based on e-mails to keep track of who has taken the required course.

Please find attached to this newsletter a flyer for the on-line course that counsel may share with their clients in Chapter 13 cases.

12. CASE LAW

In re Walko, 24-22684 (Bankr. W.D. Pa. Nov. 10, 2025)

The debtor, Walko filed a chapter 13 plan that proposed to classify for full payment the portion of creditor Caterpillar Financial Services Corporations' unsecured claim of $27,000 which was previously stipulated to be nondischargeable under section 523(a)(6) of the bankruptcy code. The plan proposed to pay other unsecured creditors with dischargeable claims nothing. The Chapter 13 Trustee objected, arguing that paying Caterpillar one hundred percent of its nondischargeable debt while paying all other unsecured creditors nothing is not merely discriminatory; it is unfairly discriminatory in a manner the statute forbids. The outcome turned on the interpretation of Section 1322(b)(1), which provides that a plan "may . . . designate a class or classes of unsecured claims, as provided in section 1122 of this title, but may not discriminate unfairly against any class so designated." If the debtors' plan were to pay all unsecured creditors pro rata, the trustee calculated that unsecured creditors would recover about 35%.

The Trustee's objection to the debtor's plan was considered by Bankruptcy Judge Jeffery A. Deller sitting in the Western District of Pennsylvania and the objection to confirmation was sustained. The opinion stated said that the words "may designate" connotes "flexibility," because "Congress could have forbidden all discrimination, but it did not. It allowed different treatment when fair." Judge Deller noted in the opinion that the Bankruptcy Code gives priority to certain types of unsecured claims, like domestic support obligations and some wages and taxes.

"To draw the line between fair and unfair discrimination, courts therefore look to the Bankruptcy Code's overall structure and purpose," Judge Deller wrote in the opinion. To draw the line, "courts have developed various tests." He cited the Eighth Circuit for developing a four-part test and the Seventh Circuit for requiring a result that is reasonable in light of relevant law. One case cited stated that it would be unreasonable to approve a plan that fully pays a nondischargeable debt while leaving other creditors with nothing. See In re Crawford, 324 F.3d. 539, 542 (7th Cir. 2003).

Judge Deller cited precedent from other circuits that raised similar concerns regarding fair treatment of creditors. The debtor cited several cases that allowed for discrimination of student loan debt and the Court called this discrimination "modest" while noting that those cases proposed some return to unsecured creditors unlike the proposed plan. The only effect of the debtor's proposed plan, the court held, would be to shift the cost of the debtor's willful misconduct onto the other innocent creditors.

Judge Deller finished the opinion by providing guidance for future bankruptcy plans that propose to discriminate within a class of creditors. He wrote that a plan discriminates "fairly" when there is a legitimate purpose, the discrimination is necessary, the degree of discrimination is no greater than necessary, and the plan is filed in good faith.

Conversely, a plan is "unfair", Judge Deller reasoned, when it results "solely" from nondischargeable debt, creates preferred treatment among creditors from the same class, diverts substantially all disposable income to one creditor, or penalizes innocent creditors.

New Agreed Entry for Turnover of Wage Bonuses

THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO

IN RE:	)	CHAPTER 13
	)	
	)	CASE NO:
	)	
	)	BANKRUPTCY JUDGE
	)	
	)	
	)	AGREED ENTRY FOR TURNOVER OF ONE HALF OF FUTURE WAGE BONUSES-GAINSHARE-INCENTIVE-COMMISIONS-LUMP SUM PAY DISTRIBUTIONS DURING PENDENCY OF CHAPTER 13 PLAN
	)	
	)	
	)	
DEBTOR(S)	)	**Last 4 digits of SSN:**

CHAPTER 13
Keith L. Rucinski
Trustee
1 Cascade Plaza
Suite 2020
Akron, Oh 44308
(330) 762-6335
Fax
(330) 762-7072

Now comes Keith L. Rucinski, the Chapter 13 Trustee, and the debtor in this case, by and through undersigned counsel, and jointly state the following:

1. This Chapter 13 case was filed on or about .
2. In the past, the debtor received substantial wage distributions from an employer.
3. The substantial wage distributions are in addition to the debtor's regular hourly or salaried wages.
4. The wage distributions are sometimes called bonuses, gainshare, incentive, or other lump sum wage distribution.
5. These wage distributions are not guaranteed to be paid in the future.
6. Future wage distributions are property of the Chapter 13 estate pursuant to 11 USC § 1306.
7. The debtor agrees to turnover one-half of the net amount of all wage distributions (after tax) received during the pendency of this Chapter 13 plan to the Chapter 13 estate for the benefit of creditors.

8. The employer, , shall divide the after tax portion of any future wage distribution between the debtor and the Chapter 13 Trustee.
9. The employer, , shall turnover one-half of all future distributions to the Chapter 13 Trustee. The balance of the distribution may be given to the debtor.
10. Should the employer, , fail to divide the wage distribution, the debtor shall turnover one-half of the distribution to the Chapter 13 Trustee.
11. The debtor is ultimately responsible for the turnover of wage distributions pursuant to this agreed entry.
12. The debtor agrees to supply the Trustee annual federal and state tax returns throughout the Chapter 13 plan.
13. The debtor understands that should they fail to turnover future wage distributions to the Chapter 13 estate that it may result in dismissal of this case.
14. In consideration of being allowed to retain one-half of any future wage distributions the debtor stipulates that the turnover of any future wage distributions is in addition to their monthly Chapter 13 payment.
15. The debtor further stipulates that the turnover of these wage distributions shall be exclusively for the benefit of the non-priority unsecured creditors.
16. The debtor agrees that the Trustee is authorized to increase the unsecured dividend to all timely filed, undisputed, non-priority, pre-petition unsecured creditors based on any future wage distribution as defined by this agreed entry.

WHEREFORE, the above agreed entry is well taken on the terms and conditions detailed herein. The debtor shall turnover one-half of the net amount of all wage distributions as a result of bonuses, gainshares, incentives, commissions, and other lump sum pay distributions to the Chapter 13 estate for the benefit of the non-priority unsecured creditors.

###

Submitted by:

_____
Keith L. Rucinski, Chapter 13 Trustee
Ohio Reg No 0063137
Joseph A. Ferrise, Staff Attorney
Ohio Reg No 0084477
One Cascade Plaza, Suite 2020
Akron, OH 44308
Tel 330.762.6335
Fax 330.762.7072
krucinski@ch13akron.com
jferrise@ch13akron.com

_____
Counsel for the debtor
Ohio Reg No _____

cc:

Debtor
Address
City state zip
(via Regular Mail)

Counsel for the debtor via ECF at
Office of the US Trustee (via ECF at ustpregion09.cl.ecf@usjoj.gov)
Keith L. Rucinski, Chapter 13 Trustee (via ECF at)

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Trustee’s Notice of Disbursements Made

Fill in this information to identify the case:	
Debtor 1	
Debtor 2 (Spouse, if filing)	
Unites States Bankruptcy Court for the:	(State)
Case Number	

Official Form 410C13-N

Trustee's Notice of Disbursements Made

12/25

The trustee must file this notice in a chapter 13 case within 45 days after the debtor completes all payments due to the trustee. Rule 3002.1(g)(1).

Part 1: Mortgage Information

Name of claim holder: _____ **Court claim no.** (if known): _____

Last 4 digits of any number you use to identify the debtor's account: ___ ___ ___ ___

Property Address:

_____
Number Street

_____

_____
City State ZIP Code

Part 2: Statement of Completion

The debtor has completed all payments due the trustee under the chapter 13 plan. A copy of the trustee's disbursement ledger for all payments to the claim holder .

Part 3: Arrearages

	Amount
a. Allowed amount of prepetition arrearage:	$ _____
b. Total amount of prepetition arrearage disbursed by the trustee:	$ _____
c. Total amount of postpetition arrearage disbursed by the trustee:	$ _____
d. Total amount of arrearages disbursed by the trustee:	$ _____

Part 4: Postpetition Payment

Check one:

Postpetition payments are made by the debtor.

Postpetition payments are paid through the trustee.

Other:

If the trustee has disbursed postpetition payments, complete a and b below; otherwise leave blank.

a. Total amount of postpetition payments disbursed by the trustee as of date of notice: $_____

b. The last ongoing mortgage payment disbursed by the trustee was the payment due on _____. All subsequent ongoing mortgage payments must be made directly by the debtor to the mortgage claimant.

Part 5: Postpetition Fees, Expenses, and Charges

Amount of postpetition fees, expenses, and charges disbursed by the trustee: $_____

Part 6: A Response Is Required By Bankruptcy Rule 3002.1(g)(3)

Within 28 days after service of this notice, the holder of the claim must file a response using Official Form 410C13-NR.

✘ /s/ _____ Date 12/16/2025
Signature

Trustee _____
First Name Middle Name Last Name

Address _____
Number Street

_____
City State ZIP Code

Contact phone _____ Email _____

Updated Request for Discharge

THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO

IN RE: «debtor» «joint»	Debtor(s)	CHAPTER 13 CASE NO: «print_casenum» ALAN M. KOSCHIK BANKRUPTCY JUDGE NOTICE OF COMPLETION OF PAYMENTS UNDER THE PLAN TRUSTEE'S REQUEST FOR THE COURT TO ISSUE A DISCHARGE IN CHAPTER 13 CASE 28 DAY NOTICE AND OBJECTION PERIOD FOR ALL PARTIES IN INTEREST

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Now comes Keith L. Rucinski, the Chapter 13 Trustee, and hereby gives notice that the debtor(s) in the above Chapter 13 case has submitted funds to complete payment to all creditors who have filed a claim in the above Chapter 13 plan confirmed on **confirmation date.**

Notice to all Creditors

The Trustee's records indicate that all amounts to be paid to all creditors on their respective claims have been paid.

Debtors and creditors may access the Trustee's records through the National Data Center. There **is no** charge for debtors and their counsel to use the National Data Center to access case information. There **is** a charge for creditors to use the National Data Center to access case information. The National Data Center is not part of the Chapter 13 office.

Creditors may access case information free of charge through the Trustee's 13Network Program (application required). The application and links to both the National Data Center and 13Network Program are available on the Chapter 13 webpage at www.chapter13info.com.

Any creditor who does not agree that the creditor has been paid in full must file an objection with the U.S. Bankruptcy Court in Akron, Ohio within 28 days from the date in the below certificate of service.

Notice to Real Property Creditors

The Trustee's records indicate that all real property creditors who have received conduit mortgage payments and/or payment on mortgage arrearages through the Chapter 13 plan have been paid in full (See Official Form 410C13-N for disbursement breakdown).

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Additional Notice to Real Property Creditors-Official Form 410C13-N

Pursuant to Rule 3002.1(g)(1), real property creditors should review **Trustee's Notice of Disbursements Made** (Official Form 410C13-N). This notice provides real property creditors with more detailed information on the amounts paid (or not paid) through the plan by the Trustee.

Within 28 days of the service of these notices, all real property creditors, regardless if the monthly mortgage payment was paid through the plan as a conduit or directly by the debtor(s), must file and serve same on the debtor(s), debtor(s) counsel, and the Trustee pursuant to Fed. Bankr. Rule 3002.1(g)(1), a statement indicating whether it agrees that the debtor(s) has paid in full the amount required to cure any default and whether, consistent with § 1322(b)(5), the debtor is otherwise current on all payments as of the date of these notices.

If any real property creditor does not agree that the debtor(s) mortgage payments are current as of the date of these notices, the real property creditor shall file an objection with the U.S. Bankruptcy Court in Akron, Ohio in response to these notices.

Effective for cases filed on or after March 1, 2016, pursuant to Administrative Order No. 19-04, if any real property creditor, who has received conduit mortgage payments though the Chapter 13 plan, fails to respond to these notices, the debtor(s) mortgages on real property shall be deemed current as of the date of these notices. The Court's order granting the debtor(s) a discharge in this case shall have the effect of deeming the mortgage(s) current as of the date of these notices and will bar the real property creditor from asserting any action in any court that there is a payment default predating these notices.

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For any real property creditor which did not receive conduit mortgage payments through the Chapter 13 plan, the debtor(s) is encouraged to file their own motion to deem the mortgage current. The discharge order in the case shall not deem the mortgage current if the real property creditor did not receive conduit mortgage payments through the Chapter 13 plan.

Request for Discharge

Additionally, the Trustee hereby requests that if no objection is timely filed, the Clerk of Court be authorized and directed to enter a discharge of debtor(s) in this case.

In accordance with 11 USC Section 102, unless a party in interest objects to this Request for the Court to Issue a Discharge in Chapter 13 Case and files a written response within 28 days from the date in the below certificate of service, the Trustee's

request shall be granted and the Court will issue an order of discharge. Objections must be served on all parties in the below certificate of service. Objections must be filed with the United States Bankruptcy Court at:

United States Bankruptcy Court
2 South Main Street
455 John F. Seiberling Federal Building
Akron, OH 44308

Respectfully submitted,

/s/ Keith L. Rucinski
Keith L. Rucinski, Chapter 13 Trustee
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been sent to:

«debtor»
«dbtr_addr1»
«dbtr_addr2»
«dbtr_addr3»
(Via Regular Mail)

«joint»
«jdbr_addr1»
«jdbr_addr2»
«jdbr_addr3»

«attorney» , at «atty_email_address» (via ECF)

Keith L. Rucinski, Chapter 13 Trustee, at efilings@ch13akron.com(via ECF)

Office of the US Trustee (via ECF)

All creditors per attached list (via Regular Mail)

Date of Service: **12/16/2025**

By: **«user_name»**
Office of the Chapter 13 Trustee

Updated Means Test
Effective November 2025

MEDIAN INCOME FOR OHIO FOR CASES FILED ON OR AFTER 11/1/2025

1 Person	2 People	3 People	4 People
$64,541	**$81,578**	**$99,876**	**$120,531**

****Add $11,100 for each individual in excess of 4 people.**

NATIONAL STANDARD FOR FOOD, CLOTHING & OTHER ITEMS

Expense	One Person	Two People	Three People	Four People
Food	$497	$863	$1,068	$1,255
Housekeeping Supplies	$45	$75	$82	$91
Apparel & Services	$93	$181	$188	$276
Personal care products & services	$50	$91	$94	$117
Miscellaneous	$154	$271	$321	$390
TOTAL	$839	$1,481	$1,753	$2,129

More than four persons	Additional Amount Per Person
For each additional person, add to four-person total allowance:	**$394**

Expense	One Person	Two People	Three People	Four People
Food & Clothing (Apparel & Services)	$590	$1,044	$1,256	$1,531
5% of Food and Clothing	$30	$52	$63	$77

More than four persons	Additional Amount Per Person
Food & Clothing (Apparel & Services)	$283
5% of Food and Clothing	$14

LOCAL HOUSING & UTILITIES STANDARDS FOR OHIO (NON-MORTGAGE EXPENSE)

Family Size	1 Person	2 People	3 People	4 People	5 or more People
SUMMIT COUNTY	$552	$648	$683	$761	$774
PORTAGE COUNTY	$583	$685	$722	$805	$818
MEDINA COUNTY	$577	$678	$714	$796	$809

LOCAL HOUSING & UTILITIES STANDARDS FOR OHIO (MORTGAGE/RENT EXPENSES)

Family Size	1 Person	2 People	3 People	4 People	5 or more People
SUMMIT COUNTY	$1,025	$1,204	$1,269	$1,415	$1,438
PORTAGE COUNTY	$1,073	$1,260	$1,328	$1,481	$1,505
MEDINA COUNTY	$1,211	$1,422	$1,499	$1,671	$1,698

IRS NATIONAL STANDARDS FOR OUT-OF-POCKET HEALTH CARE

Out of Pocket Costs	
Under 65	$84
65 and Older	$149

LOCAL TRANSPORTATION EXPENSE STANDARDS

Public Transportation	One Car	Two Cars
$244	$259	$518

OWNERSHIP COSTS

One Car	Two Car
$662	$1,324

****Lease vehicles only get the IRS ownership cost.**

Example: If your lease payment is $350 per month, you claim $619 on the means test with no other deductions. If your lease payment is $650 per month, you only claim $619 on the means test with no other deductions.

How to upload documents to Bankruptcy Documents, Chapter 13 Portal

Bankruptcy Documents – Trustee Portal System

Overview

Bankruptcy Documents is a secure document upload portal designed for sending debtor documents directly to your Trustee. With Bankruptcy Documents, you can effortlessly send files to your Chapter 13 Trustee, all while benefiting from advanced encryption for security. Attorneys enjoy a range of valuable features, including:

Send documents to multiple Trustees from a single platform.
Access detailed history records with date and time stamps.
Seamless API integration with your case management software.
And much more...

Register for an account

-To begin using Bankruptcy Documents portal you will first need to create a "Filer Account" by navigating to the following link https://www.bkdocs.us/. From here you will need to click the register link in the top right of the page and enter your email address to receive follow up information in an email which will contain a link to "Activate" your account and to finish registration.

-Once you receive the email please click the "Activate Now" link. This will take you to a page to finish setting up your account, at which you will need to simply fill out the rest of the information being asked and submit. At the end of the registration process you will see 2 options. The first option is highly recommended as you will need to request access to the Akron Trusteeship for document submitting authorization. You should click this option. Please find Keith Rucinski's name in the list of Trustees and click on "Request." This will alert the Akron Trustee's Office of your request and the appropriate actions will take place to authorize your account to be able to submit documents to Akron's Office. Once accepted by The Akron Trusteeship you can begin submitting documents the Trustee.

Submitting Documents

-After logging in with an account that is authorized, you will see the hyperlinks on the left side on the home page. Next, click on "Document Upload." Make sure "Rucinski, Keith" is selected and follow the steps outlined on this page. You will need to enter the case number manually and select what type of document this is from the drop down that correlates to the document. You may also enter a description for the document if you wish to do so. You will need to agree to the stated redacted rules before submitting. When the file is ready to send, click "Send File(s)."

More Information

-Please see https://www.bkdocs.us/about-for-attorneys.html for more information or send an email to Eric Hoffert at EHoffert@ch13akron.com

Personal Financial Management Course

COMPLETION OF A PERSONAL FINANCIAL MANAGEMENT COURSE IS REQUIRED TO EARN YOUR DISCHARGE!

Online Chapter 13 Bankruptcy Course

Finally Financial Freedom!

The Trustees' Educations Network (TEN) – an affiliate of the National Association of Chapter 13 Trustees – has created an online financial management course for the benefit and financial education of Chapter 13 debtors. This course is approved by the United States Trustee Program.

THIS COURSE IS FREE!

IT IS BEST IF THIS COURSE IS COMPLETED **PRIOR** TO YOUR

341 HEARING WITH THE TRUSTEE

SIGN UP ONLINE AT 13CLASS.COM

WHAT YOU WILL NEED:

- Your 7-digit Chapter 13 Bankruptcy Case Number with one dash, no letters (YY-XXXXX)
- The last 4-digits of your Social Security Number
- Your valid email address (If filing jointly with spouse, each debtor must create an account with a different email address and take the course individually. You can use the same computer but not at the same time.)
- Your phone number

Once all coursework is completed, a *Certificate of Debtor Education* will be emailed within three business days to your email address and will be filed with your Bankruptcy Court.

Other course providers may charge you a fee for this course, however this course is provided FREE by your Chapter 13 Trustee through the Trustees' Education Network (TEN)

In re Walko, 24-22684 (Bankr. W.D. Pa. Nov. 10, 2025)

In re Walko

United States Bankruptcy Court for the Western District of Pennsylvania

November 10, 2025, Decided

Case No. 24-22684-JAD, Chapter 13, Related to ECF No. 67 & 70

Reporter
2025 Bankr. LEXIS 2939 *; 2025 LX 534556; __ B.R. __; 2025 WL 3142166

IN RE: MICHAEL R. WALKO, Debtor.

Case Summary

Overview
Key Legal Holdings

- A Chapter 13 plan that pays 100% of a nondischargeable debt arising from willful and malicious injury while paying nothing to other unsecured creditors discriminates unfairly when the only justification is the debt's nondischargeability.
- The debtor's plan to pay Caterpillar's $27,000 nondischargeable debt in full while paying nothing to other unsecured creditors failed because nondischargeability alone does not justify preferential treatment that shifts the cost of debtor's willful misconduct to innocent creditors.

Material Facts

- Debtor sold Caterpillar equipment without consent, resulting in a nondischargeable debt of $27,000 under *11 U.S.C.S. § 523(a)(6)* for willful and malicious injury.
- Debtor's plan proposed to pay this nondischargeable debt in full while paying nothing to other unsecured creditors totaling $43,336.
- If all unsecured creditors were paid pro rata, they would receive approximately 35.8% of their claims.

Controlling Law

- *11 U.S.C.S. § 1322(b)(1) - Chapter 13*plans may designate classes of unsecured claims but may not discriminate unfairly against any class so designated.

Court Rationale

Nondischargeability alone is insufficient justification for discrimination. The plan was feasible without discrimination. Good faith was lacking as the plan shifted costs of Debtor's willful misconduct to innocent creditors. The discrimination was excessive—100% payment to one creditor, nothing to others. The 'fresh start' policy does not extend to debts arising from willful misconduct.

Outcome
Procedural Outcome

The court sustained the Trustee's objection and denied confirmation of the Debtor's Chapter 13 plan. The Debtor was ordered to file either an amended Chapter 13 plan or notice of conversion to Chapter 7 by December 1, 2025.

Counsel: [*1] For Caterpillar Financial Services Corporation, Buchanan Ingersoll & Rooney PC, Creditor: Kelly M. Neal, Buchanan Ingersoll & Rooney, Pittsburgh, PA.

For Caterpillar Financial Services Corporation, Buchanan Ingersoll & Rooney PC, Creditor: Peter S. Russ, Buchanan Ingersoll & Rooney PC, Pittsburgh, PA.

For WELLS FARGO BANK, N.A., Creditor: Adam Bradley Hall, Stephen Franks, Manley Deas Kochalski, LLC, Columbus, OH.

Judges: Honorable Jeffery A. Deller, United States Bankruptcy Judge.

Opinion by: Jeffery A. Deller

Opinion

MEMORANDUM OPINION

I.

Introduction

The question before the Court is simple to ask, but harder to answer: may a debtor's chapter 13 plan classify a nondischargeable, unsecured debt for special treatment and pay it in full while paying nothing to his other unsecured creditors?

Congress, in drafting *chapter 13 of the Bankruptcy Code (11 U.S.C. § 101 et seq.)*, told us two things at once. *Section 1322(b)(1)* provides that a chapter 13 plan may "designate a class or classes of unsecured claims," but also cautions that the plan "may not discriminate unfairly" among them. Those words matter; they permit discrimination, but only the fair kind. They allow debtors flexibility, but forbid debtors from turning that flexibility into inequitable favoritism.

Here, the debtor, Michael R. Walko (the **[*2]** "Debtor") filed an amended chapter 13 plan (*Chapter 13 Plan Dated Jul[y] 14, 2025*, ECF No. 67 (the "Plan")) that proposes to classify for full payment the portion of creditor Caterpillar Financial Services Corporations' (hereinafter "Caterpillar") unsecured claim which is stipulated to be nondischargeable under *section 523(a)(6) of title 11*. See Plan at Part 5.3 (proposing to pay Caterpillar $27,000 of "arrearage"). Meanwhile, his other unsecured creditors with dischargeable claims receive nothing. The Chapter 13 Trustee (the "Trustee") objects. She argues that paying Caterpillar one hundred percent of its nondischargeable debt while paying all other unsecured creditors nothing is not merely discriminatory; it is *unfairly* discriminatory in a manner the statute forbids. See *Chapter 13 Trustee's Objection to Debtor's July 14, 2025, Plan*, ECF No. 70 (the "Trustee's Objection").

Both sides have briefed the issue. The Debtor insists that his discriminatory treatment of claims is justified because nondischargeable debts, unlike their dischargeable cousins, follow him out of bankruptcy, threatening his fresh start. See *Debtor's Brief in Opposition to Trustee's Objection to Amended Plan date July 14, 2025*, ECF No. 76. **[*3]** ("Debtor's Brief"). The Trustee responds that nondischargeability alone is no justification, that Congress knows how to grant priority when it wishes, and that creating new priorities under the guise of classification undermines the Bankruptcy Code's structure. See *Chapter 13 Trustee's Brief in Support of Her Objection to the Amended Plan Dated July 14, 2025*, ECF No. 77 (the "Trustee's Brief").

The question of unfair discrimination has occupied many courts. As is discussed below, some apply multi-factor tests, others an equality-of-distribution analysis, and still others measure the plan against the "normative baseline" of chapter 13. The words differ, but the meaning converges: discrimination is not forbidden *per se*, but it cannot be arbitrary, disproportionate, or inconsistent with the priorities Congress enacted.

Applying those principles, this Court concludes that the Debtor's Plan discriminates unfairly. Nondischargeability, by itself, provides for survival of the debt post-bankruptcy, but not superiority. It permits collection after discharge, not preference before it. In this case, the Debtor's Plan fails to show necessity, proportionality, or good-faith justification for such **[*4]** unequal treatment. Accordingly, the Trustee's Objection will be sustained, and confirmation of the Plan denied.

II.

Factual and Procedural Background

The relevant facts are not in dispute. The Debtor filed his chapter 13 petition on October 31, 2024. His financial difficulties arose largely from a default judgment obtained by Caterpillar in the Court of Common Pleas of Westmoreland County. That judgment entitled Caterpillar to repossess certain heavy equipment and granted it a money judgment for the deficiency balance. See Debtor's Brief at 2.

Among the equipment at issue were a Caterpillar 953C Track Loader and a Caterpillar 289D Compact Track Loader. The Debtor sold one of the units without Caterpillar's consent. See Debtor's Brief at 3. On that basis, Caterpillar commenced an adversary proceeding seeking to determine that its claim was nondischargeable under *section 523(a)(6) of title 11* for willful and malicious injury to property. The parties ultimately consented to entry of a judgment by which $27,000 of Caterpillar's claim was rendered nondischargeable.[1]

The Debtor's proposed Plan calls for sixty monthly payments of $1,370. Under the Plan, **[*5]** the Debtor will pay:

(1) Capital One Auto Finance $607.34 per month on a secured claim for a 2016 Ford F-250;

(2) Snap-On-Credit $41.11 per month on a secured claim

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[1] Caterpillar filed a *Proof of Claim*, docketed on the Claims Register as "Claim 7," in the amount of $121,835.40. Of this amount, Caterpillar alleged that $56,900.00 of the total debt is secured, and the remaining $64,935.40 is unsecured. *Proof of Claim* § 9. On May 30, 2025, a *Consent Motion for Entry of Judgment* signed by Debtor and Caterpillar was filed in Adversary Case 25-02015-JAD. ECF No. 14. On June 2, 2025, this Court entered the *Judgment*, pursuant to which $27,000 of the debt to Caterpillar was deemed nondischargeable under ***11 U.S.C. § 523(a)(6)***. Adversary No. 25-02015-JAD, ECF No. 15.

for tools;
(3) Attorney's fees of $529.41 per month (for an amount totaling $3,550);
(4) The nondischargeable portion ($27,000) of Caterpillar's unsecured claim; and
(5) Nothing—($0.00)—on the remaining $43,336 in dischargeable unsecured claims.

The Trustee objects, arguing that the Plan discriminates unfairly against unsecured creditors holding dischargeable claims. If all unsecured creditors were to share *pro rata*, they would receive approximately 35.8 percent of their claims. See Trustee's Brief at 9-10. The Plan does not provide for that. Rather, insofar as dividends to general unsecured creditors are concerned, all of that funding flows to Caterpillar.

III.

Legal Landscape

The starting point is always the text of the Code. *Section 1322(b)(1) of the Bankruptcy Code* provides that a chapter 13 plan may "designate a class or classes of unsecured claims, as provided in *section 1122* of this title, but may not discriminate unfairly against any class so designated[.]" *11 U.S.C. § 1322(b)(1)*.

The phrase "may designate" grants flexibility; "may not discriminate unfairly" imposes restraint. Congress could have **[*6]** forbidden all discrimination, but it did not. It allowed different treatment when fair.

The Bankruptcy Code already delineates a priority structure among unsecured claims, which includes claims for domestic support obligations, administrative expenses, certain wages, certain taxes, and the like. See *11 U.S.C. § 507(a)*. Notably absent from this structure are nondischargeable, unsecured debts of the sort at issue here. Congress could have included them, but did not. That omission is significant. Cf. *Bentley v. Boyajian (In re Bentley), 266 B.R. 229, 240 (B.A.P. 1st Cir. 2001)*("fairness in Chapter 13 requires equality of distribution among nonpriority unsecured creditors, and the burden of justification is on those who propose plans to the contrary").

Section 1322(b)(1) thus functions as a safety valve. It gives debtors limited room to craft classifications necessary to carry out a plan, such as maintaining payments on a co-signed consumer debt to protect a family member, but it does not authorize creation of new priorities. See *id. at 241*; *In re Janssen, 220 B.R. 639, 644 (Bankr. N.D. Iowa 1998)*(maintaining a familial relationship is reasonable basis for discrimination). To draw the line between fair and unfair discrimination, courts must therefore look to the Bankruptcy Code's overall structure and purposes.

Because "unfair discrimination" is not defined, courts **[*7]** have developed various tests. For example, the Eighth Circuit's decision in *J.J. Mickelson v. Leser (In re Leser), 939 F.2d 669 (8th Cir. 1991)*, adopting the four-factor test from *Amfac Distrib. Corp. v. Wolff (In re Wolff), 22 B.R. 510 (B.A.P. 9th Cir. 1982)*, remains widely followed. Under that approach, courts examine;

> (1) whether the discrimination has a reasonable basis, (2) whether the debtor can carry out a plan without the discrimination, (3) whether the discrimination is proposed in good faith, and (4) whether the degree of discrimination is directly related to its rationale.

In re Leser, at 672.

The Seventh Circuit, in *In re Crawford, 324 F.3d 539 (7th Cir. 2003)*, adopted a pragmatic and purposive approach to the statutory prohibition against unfair discrimination. The court instructed that a bankruptcy judge should "seek a result that is reasonable in light of the purposes of the relevant law[,]" recognizing that the concept of fairness in chapter 13 defies precise definition. *Id. at 542*. Emphasizing that chapter 13 is intended to protect both debtors and creditors, the court held that it would be unreasonable to approve a plan that fully pays a nondischargeable debt while leaving other creditors with nothing. *Id. at 543*. The court further noted that discrimination favoring a nondischargeable claim arising from the debtor's own criminal fraud would be particularly objectionable. Id. Ultimately, the **[*8]** Seventh Circuit cautioned that discrimination among creditors "may not [be used] to deny consideration of the legitimate interest of creditors in repayment." *Id. at 542*.

The First Circuit Bankruptcy Appellate Panel's decision in *In re Bentley, supra.*, refined the inquiry. It rejected a rote application of multi-factor tests (including the *Leser* test) and instead examined whether the plan departs from the "normative baseline" of chapter 13 (i.e., what unsecured creditors would otherwise receive under the best-interests and disposable-income tests). See *Bentley, 266 B.R. at 239*. According to the *Bentley* court, departures are fair if they leave the disfavored class no more burdened than necessity requires and rationally advance a legitimate purpose of the Bankruptcy Code, but unfair when they reallocate benefits among equals. See *id. at 240 & 243* (also observing that "[w]here a plan redistributes benefits and burdens to the debtor's benefit and the unsecured creditors' detriment . . . it can remain fair only if the debtor 'plac[es] something material onto the scales to show a correlative benefit to the other unsecured creditors.'" (quoting *McCullough v. Brown (In re*

Brown), 162 B.R. 506, 517-18 (N.D. Ill. 1993))).

Subsequent courts have followed Bentley. See *In re Orawsky, 387 B.R. 128 (Bankr. E.D. Pa. 2008)*(nondischargeability alone does not justify discrimination); *In re Jordahl, 516 B.R. 573 (Bankr. D. Minn. 2014)*, aff'd, *539 B.R. 567 (B.A.P. 8th Cir. 2015)*(distinguishing **[*9]** reasonable bases for allowing separate treatment of nondischargeable debt).

Some older decisions approved modest discrimination favoring student loans. See *In re Whittaker, 113 B.R. 531 (Bankr. D. Minn. 1990)*; *In re Tucker, 159 B.R. 325 (Bankr. D. Mont. 1993)*. However, unlike the Plan proposed in this matter, those debtors paid something to the other unsecured creditors—not nothing. These cases are therefore distinguishable and of limited contemporary relevance.

IV.

Discussion

Measured against these standards, the Plan proposed by the Debtor cannot be confirmed.

The Debtor's only justification for separate classification is that Caterpillar's debt is nondischargeable. That, without more, is insufficient. See *Crawford, 324 F.3d at 542-43*; *Bentley, 266 B.R. at 240*.

The record before the Court is that the Chapter 13 Trustee concedes that the Plan is feasible without discrimination. See Trustee's Brief at 7-8. Nothing prevents the Debtor from paying all unsecured creditors *pro rata*. See id. at 8. The only effect of the proposed classification is to shift the cost of the Debtor's willful misconduct onto other innocent creditors. That is, the basis of this proposed discrimination is not necessity; it is a benefit to the Debtor.

Good faith is also lacking. Chapter 13 exists to help the honest but unfortunate debtor, not to let a debtor insulate **[*10]** himself or herself from the consequences of deliberate wrongdoing. See also *Coastal Credit, L.L.C. v Mellors (In re Mellors), 372 B.R. 763, 772 (Bankr. W.D. Pa. 2007)*(citing *In re Taylor, 243 B.R. 226, 229 (Bankr. W.D.N.Y. 2000)*("an absence of good faith may lay in seeking to extract too many benefits from the Chapter 13 process at a creditor's expense")). To prefer a debt arising from willful and malicious injury while paying nothing to equally situated and innocent creditors contravenes that spirit.

The degree of discrimination is also excessive. Caterpillar receives one hundred percent of the nondischargeable portion of its claim (which is in effect a 41.57 percent distribution of its total unsecured claim); the other unsecured creditors receive nothing.[2] Even cases approving modest preference involved partial payments to the disfavored class. See *In re Kalfayan, 415 B.R. 907 (Bankr. S.D. Fla. 2009)*(allowing separate classification of student loan debt where debtor's income was dependent on medical license and discrimination was necessary to avoid jeopardizing payments to unsecured creditors). Here the disparity is total.

Finally, the Debtor's reliance on the "fresh start" policy is misplaced. That policy extends only to dischargeable debts and is designed to protect the honest but unfortunate debtor—not to shield one from the consequences of willful misconduct. Congress expressly **[*11]** excluded debts for willful and malicious injury from discharge. See *11 U.S.C. § 523(a)(6)*. Permitting a debtor to pay a nondischargeable debt at the expense of other unsecured creditors would turn the statute on its head. Early payment of a nondischargeable debt through preferential classification rewards the debtor for his misconduct rather than holding him to account for it. If the Debtor's theory were accepted, it would be the innocent creditors, not the wrongdoer, who bear the cost of the Debtor's misconduct. Such a shifting of responsibility is inherently inequitable and cannot be justified absent some other reasonable basis for discrimination consistent with chapter 13's structure and the overarching duty of good faith. See *Bentley, 266 B.R. at 236* ("[P]riority does not *per se* confer or entail nondischargeability; and nondischargeability does not *per se* confer or entail priority")(italics in original).

The Court is mindful that chapter 13 reflects balance. It offers honest but unfortunate debtors the chance to reorganize their finances, but also requires them to make best efforts and to treat creditors equitably. *In re Chandler, 210 B.R. 898, 902 (Bankr. D.N.H. 1997)* (in Bankruptcy Code, principle of equal treatment of creditors is as important as providing fresh start). Congress **[*12]** knew how to prioritize nondischargeable debts but did not do so. Courts may not rewrite the Bankruptcy Code to provide what Congress did not. *Lamie v. U.S. Tr., 540 U.S. 526, 538, 124 S. Ct. 1023, 157 L. Ed. 2d 1024 (2004)*(discussing the inability of courts to re-write the words chosen by Congress).

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[2] Under the proposed Plan, Caterpillar would receive in full the nondischargeable portion of its unsecured claim. Caterpillar would not receive a distribution on the remainder of its unsecured claim ($37,935.40) and a small amount of other unsecured creditors would receive nothing as well. Just because the "others" hold claims that are much smaller than Caterpillar's does not obviate the unfairness—rather it magnifies it. Creditors holding smaller claims do not have the economic incentive to participate in these proceedings, which in-turn exemplifies the Trustee's duty and the Court's independent obligation to scrutinize the fairness of what is being proposed.

Counsel for the Debtor's argument in support of the Plan confuses the concept of flexibility with license. *Section 1322(b)(1)* gives the Debtor discretion, but it is not unlimited or unbounded. Equality of distribution among creditors similarly situated remains the baseline. Plans departing from that principle must rest on a clear, Bankruptcy Code-based justification.

Here, the Debtor has shown none. The discrimination proposed by the Debtor's Plan is absolute, and the justification is virtually nonexistent. On this basis, confirmation of the Plan must be denied.

To be clear, the Court today does not hold that every plan treating a nondischargeable claim differently must fail. Congress provided room for fair discrimination, and there may be circumstances where such treatment passes muster.

Imagine a different plan, one in which the debtor pays post-petition interest on the nondischargeable claim during the life of the plan, leaving all or some of the principal balance to survive the discharge, **[*13]** while devoting all other disposable income to a *pro rata* distribution for unsecured creditors. Such a structure could potentially be viewed as proportional, rational, and consistent with chapter 13's rehabilitative purpose.

The Court makes this observation because courts have long recognized that *section 502(b)(2)* disallows post-petition interest as part of an allowed claim, yet interest on nondischargeable debts continues to accrue outside bankruptcy. *Bruning v. United States, 376 U.S. 358, 360, 84 S. Ct. 906, 11 L. Ed. 2d 772, 1964-2 C.B. 500 (1964)*. A plan that services the accruing interest could be proportional (and fair) discrimination that fosters the fresh start and prevents that nondischargeable debt from growing during the case without creating an impermissible priority. That type of classification might demonstrate good faith and best efforts, ensuring all unsecured creditors share in the debtor's income while addressing legitimate rehabilitative concerns. Whether such a plan would satisfy *section 1322(b)(1)* would depend on the evidence and totality of circumstances, but it would at least reflect proportion and necessity. That, however, is not the Debtor's Plan. His proposal seeks to pay the nondischargeable portion of Caterpillar's unsecured claim in full (which amounts to a significant overall distribution **[*14]** of its total unsecured claim), while leaving every other unsecured creditor empty-handed. The classification benefits only the Debtor, not the estate, and penalizes innocent creditors to compensate for the Debtor's willful injury to Caterpillar's collateral. That is not fairness; it is an excessive and unreasonable preference.

V.

Conclusion

This case, though resolved on its particular facts, implicates a recurring question: when does separate classification of unsecured claims cross the line from fair to unfair discrimination? Because that question will arise again, the Court offers the following guidance for future cases before the undersigned.

The starting point is equality. Chapter 13 presumes that unsecured creditors of equal rank share alike in the debtor's disposable income. That presumption, reflected in *sections 507*, *1322(a)(3)*, and *1325(a)(4)*, forms the baseline against which all discrimination must be measured.

But equality is not an iron rule. Congress expressly authorized debtors to "designate a class or classes of unsecured claims," provided the plan "does not discriminate unfairly." *11 U.S.C. § 1322(b)(1)*. The phrase "may not discriminate unfairly" presupposes that some discrimination is permissible. The question, then, is not **[*15]** whether one creditor is worse off (because every classification necessarily makes someone worse off), but whether the disparity is justified by a legitimate, Bankruptcy Code-based purpose and is no greater than necessary to achieve it.

A plan discriminates fairly when:

(1) the classification serves a legitimate purpose consistent with the Bankruptcy Code's structure (such as protecting a co-debtor, preserving the debtor's employment, or preventing a nondischargeable obligation from expanding during the plan term);

(2) the discrimination is necessary to accomplish that purpose or to render the plan feasible;

(3) the degree of discrimination is no greater than necessary to accomplish that end and bears a rational, proportionate relation to it; and

(4) the plan is proposed in good faith within the meaning of *section 1325(a)(3)*.

The debtor, as plan proponent, bears the burden of proving by a preponderance of the evidence that any discrimination is fair under *section 1322(b)(1)*. See *In re Jordahl, 516 B.R. at 577*.

By contrast, discrimination is unfair when it:

(1) rests solely on the nondischargeable character of the favored debt;

(2) creates a *de facto* priority among equals without a statutory basis;

(3) diverts all or substantially all of the debtor's disposable **[*16]** income to one creditor for reasons of convenience or preference rather than necessity; or
(4) penalizes innocent creditors to compensate for the debtor's own misconduct.

This framework recognizes that every instance of discrimination produces some disparity but demands that such disparity be made in good faith, and is rational, proportionate, and anchored in the Bankruptcy Code's design. As the courts in *Bentley*, *Orawsky*, and *Crawford*, supra., have recognized, "unfair" discrimination occurs not when classes are treated differently, but when that difference lacks necessity or proportionality.

The Court's task, then, is not to follow its sympathies but to measure justification against the statute's architecture. While *section 1322(b)(1)* grants flexibility, fairness in this context is a matter of reasoned fidelity to Congress's words and the equality of distribution that undergirds the bankruptcy system.

As applied here, that principle requires that confirmation of the Debtor's Plan must be denied. But it also leaves space for the honest but unfortunate debtor who acts in good faith and channels his or her best efforts toward a legitimate rehabilitation. A plan that differentiates for sound reasons, confines the disparity to what necessity requires, **[*17]** and aligns with the Bankruptcy Code's design will meet the test of fairness and will be confirmed.

For the reasons set forth above, the Trustee's Objection is therefore sustained. Confirmation of the Plan is denied. An appropriate Order shall be issued.

Date: November 10, 2025

/s/ Jeffery A. Deller

The Honorable Jeffery A. Deller

United States Bankruptcy Judge

ORDER

AND NOW, this 10th day of November, 2025, for the reasons stated in the *Memorandum Opinion* issued contemporaneously herewith, it is **HEREBY ORDERED, ADJUDGED, and DECREED**, as follows:

1. The *Chapter 13 Trustee's Objection to Debtor's July 14, 2025, Plan* (ECF No. 70) is **sustained**;

2. Confirmation of the Debtor's *Chapter 13 Plan Dated Jul[y] 14, 2025* (ECF No. 67) is **denied**;

3. On or before December 1, 2025, the Debtor shall file either:
a. an amended chapter 13 plan; or
b. notice of case conversion to chapter 7; and

4. Failure to timely make the filing required by paragraph 3 above shall result in the automatic dismissal of the above-captioned bankruptcy case without prejudice and without further notice and/or hearing.

Date: November 10, 2025

/s/ Jeffery A. Deller

The Honorable Jeffery A. Deller

United States Bankruptcy Judge

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