

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

CASE NO: 3:09-bk-00877-PMG
CHAPTER 13

In re
Mark Dixon

Debtor(s). _____/

GREEN TREE SERVICING LLC'S
NOTICE OF OBJECTION TO CONFIRMATION

COMES NOW the secured creditor, Green Tree Servicing, LLC, successor servicer to Green Tree Financial Servicing Corporation, by and through its undersigned attorney and hereby serves its notice of objection to confirmation of the Debtor(s) proposed Chapter 13 Plan. This Creditor filed a secured Proof of Claim on or about February 28, 2009 indicating that the total amount of the claim at the time the case was filed was \$37,472.02 as it relates to the property located at 56124 Dixon Trail, Callahan, Florida 32011. The Debtor(s) proposed Plan provides to pay this Creditor monthly payments of \$320.00.

This Creditor objects to confirmation based upon the following:

1. The Debtor(s) proposed Plan provides for the incorrect regular monthly payment amount. The correct payment amount is \$384.12, which includes \$322.46 for principle and interest and \$61.66 for force placed insurance.

2. The Debtor(s) proposed Plan does not provide for curing the correct pre-petition arrearage amount of \$6,914.32.

WHEREFORE, this Creditor respectfully requests this honorable Court to deny confirmation and dismiss this case, or in the alternative, direct the Debtor(s) to amend the Plan to conform to this objection.

DATED: March 10, 2009.

SCHUYLER·STEWART·SMITH

/s/ Jason A. Burgess

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CERTIFICATE OF SERVICE

I CERTIFY that a copy has been furnished either by electronic or standard first class mail on March 10, 2009, to: Mark Dixon, Debtor, 56124 Dixon Trail, Callahan, FL 32011; T. Eileen Dolaghan, Debtor Attorney, 2219 Park Street, Jacksonville, FL 32204; Douglas W. Neway, Trustee, P O Box 4308, Jacksonville, FL 32201.

SCHUYLER·STEWART·SMITH

/s/ Jason A. Burgess

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