

- 8) The court has not, since confirmation of the plan, approved any further expenses, fees or charges in connection with the claim of BANK.

WHEREFORE, the debtors request this Court to declare:

- 1) That the debtors' mortgage loan has been cured so that it is current as of the effective date of the debtors' discharge and the debtors' remaining balance due is the amount that would have existed if their default had never occurred.
- 2) That any amounts for charges, fees or expenses that BANK may allege the debtors to owe as of the date of the discharge in connection with any default on their mortgage or otherwise, that have not been approved by this Court through the allowance of the claim of BANK or otherwise, be deemed cured by completion of the plan and therefore canceled and discharged by the discharge order.
- 3) That any attempt to collect any of these discharged charges, fees or expenses be deemed to be a willful violation of the discharge injunction and contempt of the orders of this Court.
- 4) That the debtors be afforded such other and further relief as is just and proper.

/s/John Rogers
John Rogers, Attorney for Debtors
111 West Wayne Street
Glasgow, Kentucky 42141
(270) 651-7777

CERTIFICATE OF SERVICE

I certify that a copy of this motion was served by first class mail upon and/or electronic mail this _____ day of _____, 2010 to the following:

William W. Lawrence
ECF@louchapter13.com

CREDITOR AND/OR THEIR ATTORNEY

/s/John Rogers
John Rogers, Attorney for Debtors
111 West Wayne Street
Glasgow, Kentucky 42141
(270) 651-7777