

1. In resolution of [NAME OF MOVANT]'s Motion for Relief from the Automatic Stay in regard to realty owned by the Debtor, a Consent Order and Stipulation (Order) was entered on or about [INSERT DATE].
2. Pursuant to the Order, Debtor agreed to make monthly post-petition payments as they became due beginning [INSERT DATE HERE] to the address provided by Movant, or its successors and assigns in the monthly mortgage statement.
3. It was further stipulated that in the event the Debtor failed to perform in making these payments, Movant was required to provide notice under the terms of the Order. Thereafter, Movant would be entitled to an Order from the Court granting relief from the automatic stay allowing Movant to exercise all of its rights and remedies under the Promissory Note, Deed of Trust, or as may otherwise be provided for by state and non-bankruptcy law.
4. The Order filed in resolution of Movant's motion has been breached by the Debtor. As of [INSERT DATE], a delinquency in the amount of [INSERT AMOUNT] exists under the terms of the Order. A breakdown of the delinquency is as follows:

_____ payment(s) @ \$_____	(INSERT DATES OF DELINQUENT MONTH(S))	\$ _____	
MFR Attorney Fees		\$ _____	
MFR Attorney Costs		\$ _____	
Total		\$ _____	

The address to which payments can be made for [NAME OF MOVANT] is:

[INSERT ADDRESS]

WHEREFORE, pursuant to the Order, Movant hereby gives notice that in the event a valid defense is not set forth or funds tendered sufficient to cure the delinquency identified above along with all amounts that have come due under the terms of the Promissory Note, Deed of Trust, and/or Order of the Court within fourteen (14) days of the date given below, Movant, or its successors and assigns will herewith be proceeding with foreclosure in order to pursue its rights and remedies under state and non-bankruptcy law in connection with the subject Promissory Note and/or Deed of Trust. Movant will request this Court issue an Order granting relief from the automatic stay to Movant for such purposes.

DATED: _____

/s/ Movant's Attorney
 Movant's Attorney, Bar #
 Address
 City, State, Zip
 Telephone
 Facsimile
 Email address

CERTIFICATE OF SERVICE

I. I certify that a true and correct copy of the foregoing document was filed electronically on _____ with the United States Bankruptcy Court and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

(LIST NAMES AND ELECTRONIC ADDRESSES)

/s/ Movant's Attorney
Movant's Attorney, Bar #
Address
City, State, Zip
Telephone
Facsimile
Email address

II. I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to the parties listed below on _____:

(LIST NAMES AND PHYSICAL ADDRESSES)

/s/ Movant's Attorney
Movant's Attorney, Bar #
Address
City, State, Zip
Telephone
Facsimile
Email address