

EXHIBIT D

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF COLORADO**

In re:)	
)	
JOE DEBTOR and)	Bankruptcy Case No.
JOELENE DEBTOR,)	00-00000 HRT
Debtor(s).)	Chapter 13
)	
Address: [INSERT ADDRESS])	
[INSERT CITY, STATE, ZIP])	
)	
Last four digits of SS#: @)	
and @,)	
Employer's Tax Identification)	
No. [if any]:)	

**CERTIFICATION REGARDING OBJECTION TO PLAN
PURSUANT TO T.L.B.R. 3015-1(d)**

The Debtor(s) by and through their counsel, [name of counsel], submit the following Certification Pursuant to Transitional Local Bankruptcy Rule 3015-1(d) and state as follows:

1. The Debtor(s) filed for Chapter 13 relief on [DATE]. The Debtor(s) attended their Section 341(a) Meeting of Creditors on [DATE]. The Trustee [and/ or objecting party(ies)] has/have filed an objection(s), Docket Nos. [] to the Debtor(s) Chapter 13 plan filed on [DATE], Docket No.[]

2. On [DATES] the Debtor(s), through counsel, conferred with the attorney for the Standing Chapter 13 Trustee [and/or the objecting party(ies)] regarding the(ir) objection(s) to confirmation.

PLAN AMENDMENTS

3. The Debtor(s) has/have or will file an amended plan on [DATE], Docket No. [], which satisfies or will satisfy all objections raised by the Trustee [or the objecting party(ies)]. The plan is amended to make the following changes which are delineated in the amended plan by an asterisk, underscored or highlighted:

- a.
- b.
- c. etc.

OR

4. The Debtor(s) filed and provided to the Objectors an amended plan [DATE], Docket No. [], which they believe resolves the issues raised in paragraphs____of the Trustee's [and/or objecting party(ies)] objection to confirmation. The Debtors request judicial determination of the issues raised in paragraphs____of the objection(s). The precise issue(s) remaining for judicial determination are as follows:

- a.
- b.
- c.

The Debtor(s) anticipate the expected court time necessary to determine this contested matter will be____minutes/hours.

The Debtor(s) anticipate(s)____fact witness(es) and/or____expert witness(es) will be called to testify in this contested matter.

OR

5. The Debtor(s) do not anticipate filing an amended plan to satisfy any objections to the confirmation of their Chapter 13 plan and instead request judicial determination of all of the objections filed by the Trustee [and/or the objecting party(ies)].

The Debtor(s) anticipate the expected time necessary to determine this contested matter will be____minutes/hours.

The Debtor(s) anticipate(s)____fact witness(es) and/or____expert witness(es) will be called to testify in this contested matter.

SCOPE OF NOTICE OF AMENDED PLAN (IF APPLICABLE)

6. The Debtor(s) believe(s) notice of the amended plan should be provided to less than all creditors and interested parties and/or that the time to object should be shortened for the following reasons:

OR

7. The Debtor(s) believe(s) notice of the amended plan must be served on the Standing Chapter 13 Trustee and to all creditors and interested parties.

Respectfully submitted this ____ day of _____, 200__.

[Attorney Name] for Debtor

Address

Phone No.

Facsimile No.

E-mail address

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF COLORADO**

In re:)	
)	
JOE DEBTOR)	
JOELENE DEBTOR)	Case No. 00-00000 HRT
)	Chapter 13
Debtors.)	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he/she served a true and correct copy of the Certification Pursuant to Transitional Local Bankruptcy Rule 3015-1(d) by placing the same in the United States Mail, first class postage pre-paid, this ____ day of _____, 200_:

Standing Chapter 13 Trustee
c/o Sally Zeman, Esq.
P.O. Box 1169
Denver, CO 80201

[DEBTOR'S/DEBTORS' ADDRESS]

[OBJECTORS AND ENTRIES OF APPEARANCE]

Commentary

Counsel for the debtor is required to complete paragraphs one and two in all instances. Thereafter, counsel should choose the paragraph and language that is applicable to the facts and circumstances of any given Chapter 13 case.

Debtors shall state whether notice of the amended plan (if applicable) should be provided to specific parties or all creditors and interested parties. If counsel believes notice should be limited to specific parties, the reasons for limited notice and/or an abbreviated objection period should be stated in paragraph eight (8) with specificity.