

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:	)	Chapter 13
	)	
██████████ and	)	Case Number: ██████████
██████████	)	
	)	Honorable ██████████
Debtors.	)	
	)	Trustee: ██████████
	)	

NOTICE OF HEARING

TO: See attached list

PLEASE TAKE NOTICE that on ██████████, at 10:00 a.m., I will appear before the Honorable ██████████, or any judge sitting in that judge's place, and present Debtors' Objection to Claim #15 Filed by ██████████ and Request to Shorten Notice, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com>. Then enter the meeting ID.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID.

Meeting ID and password. The meeting ID for this hearing is ██████████. The passcode is ██████████. The meeting ID and further information can also be found on Judge ██████████ web page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Dated this [REDACTED].

By: /s/ Jon Dowat
Counsel for Debtors
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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:

██████████ and
██████████,
Debtors.

) Chapter 13
)
) Case Number: ██████████
)
) Honorable ██████████
)
) Trustee: ██████████
)
) Hearing Date: ██████████

DEBTORS' OBJECTION TO CLAIM #15 FILED BY ██████████

NOW COME ██████████ (hereinafter "Debtors"), through their attorney, Jon Dowat, objecting to Claim #15 filed by ██████████ (hereinafter "██████████"), and in support thereof state as follows:

1. This Honorable Court has jurisdiction pursuant to 11 U.S.C. 1134, and this is a "core proceeding" under 28 U.S.C. 157(b).
2. Debtors filed a joint voluntary petition for relief and a plan of reorganization under Chapter 13 of Title 11 of the United States Code on ██████████, as case number ██████████.
3. The Chapter 13 Plan in this case has not been confirmed.
4. As this Objection relates to Debtors' Plan Confirmation, Debtors respectfully request that this Objection be heard in conjunction with the Plan Confirmation.

BACKGROUND

5. Debtor ██████████ (hereinafter "██████████") filed a Petition for Dissolution of Marriage from ██████████ on ██████████, as case number ██████████.
6. ██████████ filed a voluntary petition for relief and a plan of reorganization under Chapter 13 of Title 11 of the United States Code on ██████████, as case number ██████████.

7. [REDACTED] filed Proof of Claim #2 in case number [REDACTED] in the amount of \$23,199.88 for domestic support obligations. A true and correct copy of Proof of Claim #2 is attached hereto as "Attachment A."
8. Per the Claim Summary on the National Data Center, the Office of the Chapter 13 Standing Trustee, [REDACTED], disbursed a total of \$9,905.79 to [REDACTED] in the previous bankruptcy filing. A true and correct copy of the Claim Summary from the National Data Center is attached hereto as "Attachment B."
9. [REDACTED]'s bankruptcy case number [REDACTED] was dismissed on [REDACTED].
10. In the instant case, [REDACTED] filed Proof of Claim #15 in the amount of \$16,437.15 for domestic support obligations. A true and correct copy of Proof of Claim #15 is attached hereto as "Attachment C."
11. Claim #15 lists a balance of \$12,051.00 for domestic support obligations due to [REDACTED] from [REDACTED]'s previous bankruptcy (case number [REDACTED]).
12. [REDACTED] concedes that the \$12,051.00 listed in Claim #15 is due to [REDACTED].
13. Claim #15 lists additional amounts that [REDACTED] claims are due to her:

50% of medical and education expenses for [REDACTED]'s children incurred since [REDACTED]:	\$2,047.40
Legal fees related to bankruptcy case numbers [REDACTED] and [REDACTED]:	\$2,338.75

14. The total amount of Claim #15 is \$16,437.15.
15. [REDACTED] disputes that he owes the \$2,047.40 in medical expenses and the \$2,338.75 in legal fees as listed in Claim #15.

THE MEDICAL AND EDUCATION EXPENSES

16. In [REDACTED] and [REDACTED]'s divorce, the court did not order [REDACTED] to pay the aforementioned medical or educational expenses to [REDACTED].
17. Any medical or educational expenses that were owed to [REDACTED] were paid by [REDACTED] to the best of his knowledge.
18. As [REDACTED] has never received an itemized list of additional medical or educational expenses, [REDACTED] disputes the validity of the medical and educational expenses listed in [REDACTED]'s claim.

THE BANKRUPTCY-RELATED FEES

19. [REDACTED] disputes that he owes the \$2,338.75 in bankruptcy-related fees to [REDACTED] as listed in Claim #15.
20. In [REDACTED] and [REDACTED]'s divorce, the court did not order [REDACTED] to pay the aforementioned bankruptcy-related fees to [REDACTED].
21. [REDACTED] has never received an itemized bill for the aforementioned bankruptcy-related fees.
22. There is no statutory support for awarding bankruptcy-related fees in a divorce case.

WHEREFORE Debtors pray that this Honorable Court disallow Claim #15 filed by

[REDACTED]

Dated this [REDACTED].

Respectfully submitted,

By: /s/ Jon Dowat

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