SUGGESTED LAWSUIT LANGUAGE

In the event the debtor recovers any non-exempt proceeds from their pending lawsuit, those proceeds will be placed in the Debtor's Attorney's Trust Account and turned over to the Chapter 13 Trustee for the benefit of the unsecured creditors over and above what is provided for in the plan up to 100% of allowed unsecured claims.

SUGGESTED LANGUAGE REGARDING CHANGED CIRCUMSTANCES (LANNING LANGUAGE)

Explain the changed circumstances, delineate the changes to lines below to reflect the new net income amount. Recalculate line 44 accordingly. Amend line 45. This is the new disposable income calculation. **Do not amend the CMI Form. Only provide the changes in Other Provisions of the Plan.**
The new gross income on line 11 is $__________________. The new tax deduction on line 16 is $__________________. The new insurance deductions on line 22 are $__________________ (if applicable). The new qualified retirement deductions on line 17 are $__________________ (if applicable). The total of all deductions on line 42 is now $__________________. The new monthly disposable income on line 45 is now $__________________.

SUGGESTED LANGUAGE FOR ORDERS ON MOTIONS TO ALLOW LATE FILED PROOFS OF CLAIM

(Non-Recoupment Language)

The Trustee shall not be required to recoup any funds disbursed to any creditors prior to the date of this Order. Movant shall receive a pro rata distribution of the total amount paid to all allowed general unsecured creditors under the confirmed plan, commencing the month following the date of this Order and shall not be entitled to any share of any distribution paid to any creditor prior to the date of this Order.

SUGGESTED VESTING LANGUAGE

To facilitate the administration of this case, any and all interim pre-confirmation payments made to Robin R. Weiner, Standing Chapter 13 Trustee ("Trustee") shall be non-refundable to the Debtor.

The Debtor is ordered to continue making payments each month to the Trustee in accordance with the last filed Chapter 13 Plan. Failure to continue payments may result in the dismissal of the case.

As a condition for the continued confirmation hearing and delay of payments made to the creditors, the Trustee shall hold any and all interim pre-confirmation payments in trust as adequate protection payments for the secured creditors and in trust for the administrative and priority creditors on a pro-rata basis, in accordance with the last filed plan at least one day prior to the last confirmation hearing date, less all applicable Trustee's fees and costs pending confirmation, conversion or dismissal of the case.

If for any reason, the case is dismissed or converted to any other chapter in bankruptcy, the Trustee shall disburse in the normal course all payments held in trust on a pro-rata basis, in accordance with the last filed plan filed at least one day prior to the last confirmation hearing date, less all applicable Trustee's fees and costs.

GAMBLING

The Debtor agrees to provide personal and business bank statements to the Chapter 13 Trustee every six (6) months during the term of the plan and agrees not to gamble during the plan term. If the Chapter 13 Trustee determines that the Debtor has violated the provisions of the plan the Debtor will agree to an immediate dismissal of the case and further agrees to file a Notice of Voluntary Dismissal within seven (7) days of receipt of such request by the Chapter 13 Trustee.