

EXHIBIT P

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

IN RE:

[Debtor Name],

Debtor(s).

C/A No. _____

Chapter _____

**NOTICE AND MOTION FOR
LOSS MITIGATION/MORTGAGE
MODIFICATION PURSUANT TO
JUDGE WAITES' CHAMBERS
GUIDELINES**

To: _____ ("Mortgage Creditor") and Parties in Interest

The Debtor(s), through counsel, hereby move the Court for an Order Requiring Loss Mitigation/Mortgage Modification with respect to the following property:

[Identify the Property]

[Last Four Digits of Loan Number]

[Mortgage Creditor's Name and Address]

The Debtor(s) request an order directing the parties to participate in the Loss Mitigation/Mortgage Modification (LM/MM) via the Portal as set forth in Judge Waites' Chambers Guidelines, available at <http://scb.uscourts.gov/content/judge-waites>

Prior to filing this Motion, Debtor(s)' Counsel has determined that:

The Mortgage Creditor is registered with the Portal. Within 1428 days after entry of the Order, Debtor(s)' Counsel will upload to the Portal Debtor(s)' Prepared Package ~~together with any additional forms or documents which the Mortgage Creditor may post~~ on the Portal.

The Mortgage Creditor is not registered. The Debtor(s) request that the Court require Mortgage Creditor to register with the Portal within 7 days after entry of the Order. Within 1428 days after entry of the Order, Debtor(s)' Counsel will upload to the Portal Debtor(s)' Prepared Package ~~together with any additional forms or documents which the Mortgage Creditor may post~~ on the Portal.

The Debtor(s) have or have not previously sought loss mitigation/mortgage modification through any procedure/process during this bankruptcy case or within the previous two years. List dates and results: _____

The Debtor(s)' current Chapter 13 plan does or does not provide for a LM/MM review.

If a previous attempt at loss mitigation/mortgage modification was made during this case or is ongoing if the Court has previously granted the Mortgage Creditor relief from the automatic stay in this case, the change of circumstances which makes this attempt more likely to succeed is as follows:

TAKE FURTHER NOTICE that any response, return and/or objection to this Motion should be filed with the Court no later than 14 days from service of the Motion and a copy simultaneously served on all parties in interest.

TAKE FURTHER NOTICE that no hearing will be held on this Motion, except as required by the Judge, unless a response, return and/or objection is timely filed and served, in which case, the Court will conduct a hearing on _____, ____ at ____ a.m./p.m. at _____, _____, South Carolina. No further notice of this hearing will be given.

Attorney Name & Fed. ID #
Address
Email