IN THE UNITED STATES BANKRUPTCY COURT

FOR THE EASTERN DISTRICT OF WISCONSIN

In re Chapter 11

\_\_\_\_\_\_\_\_\_\_\_\_\_, Case No. \_\_\_\_\_\_\_\_

Debtor.

**MOTION TO ADMINISTRATIVELY CLOSE CHAPTER 11 CASE**

\_\_\_\_\_\_\_\_\_\_\_\_\_ (the “Debtor”), by his/her attorney, moves the Court for entry of an order administratively closing the Debtor’s chapter 11 case, and respectfully represents:

1. On \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, the Court entered an Order confirming the Debtor’s Chapter 11 plan.

2. The Debtor seeks an order administratively closing the case for the pendency of the Chapter 11 plan, provided that the order will not operate to close the case for the purposes of 28 U.S.C. § 1930 Appendix (11), 11 U.S.C. § 362(c)(2)(A), or Fed. R. Bankr. P. 4006.

3. The Debtor filed monthly operating reports through the confirmation hearing date and will continue to file quarterly reports with the U.S. Trustee. All quarterly fees due to the U.S. Trustee have been paid.

4. The Debtor has made all plan payments due up to the date of this motion.

5. The plan has been substantially consummated as defined by 11 U.S.C. § 1101(2), and the bankruptcy estate has been fully administered, except for the completion of all plan payments.

6. All litigation in the Chapter 11 case has concluded.

7. The Debtor requests that jurisdiction remain with the Bankruptcy Court pursuant to the plan, and at plan completion, the Debtor will move to reopen the case to obtain a discharge and final decree.

WHEREFORE, after notice and a hearing, if requested by a party in interest, the Debtor respectfully requests that the Court enter an order administratively closing this Chapter 11 case, subject to reopening for granting of a discharge, and granting such other and further relief as the Court deems appropriate.

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature Block for Debtor’s Attorney

**NOTES**

Unless the Court orders or the confirmed plan provides otherwise, serve this Motion on the “shortened service list” for the case. If there is no shortened service list, serve the Debtor, Creditors’ Committee (or top 20 unsecured creditors if there is no committee), the U.S. Trustee, and all creditors who have requested notice in the case. File a certificate of service.

If the notice period runs without objection, upload a proposed Order administratively closing the case. (Local Form available.)

When plan payments have been completed (or if the Debtor qualifies for a discharge before completion of plan payments under 11 U.S.C. § 1141(d)(5)(B)), file a motion to reopen the case for entry of entry of discharge and final decree. (Local Form available.) **Note there is a filing fee for the motion to reopen; as of April 1, 2016, the fee was $1,167.**