

In the United States Bankruptcy Court for the District of Columbia

IN RE: : Case No. 19-00191 smt
Roseline I. Ohakpor :
Debtor Chapter 13

MOTION FOR CONTINUATION OF AUTOMATIC STAY

Now Comes Debtor, by Counsel Harris S. Ammerman, and moves this Court pursuant to 11 U.S.C. § 362(c)(3)(B) for an order continuing the automatic stay provided under § 362(a) as to all creditors, and states:

1. Debtor filed a petition under chapter 13 on March 6, 2019.
2. Debtor had previously filed a chapter 13 case pro se on 1/29/19 (19-00078) which was dismissed 2/7/19 for failure to file information
3. The debtor has filed a Chapter 13 plan which provides for the sale of her residential property which has sufficient equity to pay off in full the secured creditors and other claims. The record in the previously dismissed case shows that the debtor lacked an understanding of her duties and obligations under Chapter 13 and didn't have the ability to conduct a proper administration of her case.
4. The debtor's Schedules I and J filed in this case show that the debtor's newly filed Chapter 13 case is feasible.
5. The instant petition in this case has been filed in good faith and counsel believes that the proposed Chapter 13 Plan will be confirmed and that she will be able to fully perform under the terms of the Plan. The debtor has sufficient income to satisfy the proposed monthly plan payment.
6. The Debtor's prior dismissed Chapter 13 case was the only previous case by the Debtor that was pending during the preceding year.

Wherefore, Debtor prays that this Court continue the automatic stay under § 362(a) as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under § 362(c)(1) or (c)(2), or a motion for relief is granted under § 362(d).

Respectfully submitted,

/s/ Harris S. Ammerman #04141
Harris S. Ammerman, Esq.
1115 Massachusetts Ave. NW
Washington, D.C. 20005
(202) 638 0606

CERTIFICATE OF SERVICE

I hereby certify on this 27th day of March, 2019 that I reviewed the Court's CM/ECF system and it reports that an electronic copy of the Motion to Extend the Automatic Stay will be served electronically by the Court's CM/ECF system on the following:

Nancy Spencer Grigsby, trustee
185 Admiral Cochrane Dr. Suite 240
Annapolis, MD 21401

I hereby certify on this 27th day of March, 2019, a copy of the Motion to Extend the Automatic Stay was also mailed first class mail, postage prepaid to

All creditors on the attached mailing matrix

Respectfully submitted,

/s/ Harris S. Ammerman #04141
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