IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
_____ DIVISION

In re:	§	
	§	**Case No. _____**
[Debtor(s)' Names],	§	**(Chapter 13)**
	§	
Debtor(s).	§	

MOTION TO CONVERT CHAPTER 13 CASE TO CHAPTER 7 CASE
AND TO PAY ADMINISTRATIVE CLAIM TO DEBTOR(S)' COUNSEL

1. This motion is filed by the Debtor(s).

2. Pursuant to 11 U.S.C. § 1307(a), the Debtor(s) may convert this case to a case under chapter 7 "at any time." Pursuant to paragraph 24 of the confirmed plan in this case, the Debtor(s) elect to convert this case to a case under chapter 7 effective on the 38th day following the filing of this motion.

3. Pending the conversion, the Debtor(s) seek to suspend all payment obligations to the chapter 13 trustee.

4. The Debtor(s) require the assistance of counsel for the conversion. Accordingly, the Debtor(s) request that funds on deposit with the chapter 13 trustee be disbursed in accordance with paragraph 24 of the confirmed plan. The Debtor(s) request that the disbursements include _____ (not to exceed $750.00) as payment to counsel for post-conversion services.

Signed : _____

[Signature Block]