

**Proposed Bankruptcy Rules 3001, 3002**

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I am a sole practioner. My bankruptcy clients are mostly consumer Chapter 7 & Chapter 13 debtors.

I welcome the proposed rule changes. They do not require of creditors any more than those creditors would be required to produce if deficient proofs of claim were challenged. But the economies applicable to consumer debtor practice reveal that deficiencies in proofs of claim are frequently not challenged because the expected corrective result would not be worth the expenditure of time and money. For example, deficiencies which yield an additional \$250-\$400 for a creditor might cost \$500 or more in basic attorney time to challenge. Even if the challenge were a success, the debtor would be less well off than if the deficiencies were ignored.

Similarly, there no efficient and uniform end-of-plan procedures for protecting debtors whose mortgages or other debts have been cured by a successful Chapter 13 from overreaching by the "cured" creditors after the bankruptcy has been completed and closed. And to file an end-of-plan motion for a protective order, especially if the relief sought is only prophylactic, is unreasonably expensive.

It would be a benefit for successful Chapter 13 debtors to have in place procedures, such as are proposed by these rule changes, to maintain the streamlined and efficient reorganizations Chapter 13 was originally designed to implement.

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