

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

IN RE:	§	CHAPTER 13
	§	
CHRISTINA A. MORENO	§	
	§	
DEBTOR	§	CASE NO. 13-51775-CAG

**BEXAR COUNTY'S OBJECTION TO  
CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN**

TO THE HONORABLE COURT:

Now comes Bexar County and files this Objection to Confirmation of Debtor's Chapter 13 Plan ("Plan") dated July 1, 2013, and support thereof would respectfully show the Court as follows:

1. Bexar County is the holder of claim in the amount of \$7,745.45 for year 2012 and estimated year 2013 ad valorem taxes on the Debtor's property situated in the City of San Antonio, Bexar County, Texas as follows:

- a. Real property located at 240 Christine Dr. (tax account number 09511-006-0160) in the amount of \$4,466.17 for 2012 and estimated 2013 ad valorem taxes.
- b. Real property located at 12210 Madrigal St. (tax account number 14240-019-0300) in the amount of \$3,279.28 for estimated 2013 ad valorem taxes.

This claim is secured by liens on the property pursuant to sections 32.01 and 32.05 of the Texas Property Tax Code.

2. The Debtor's Chapter 13 Plan does not adequately provide for the claim of Bexar County in that the Plan fails to treat the tax claim in its entirety.

3. As an over secured creditor, Bexar County is entitled to interest on its claim from the petition date. U.S. v. Ron Pair Enterprises, 489 U.S. 235 (1989). Bankruptcy Code Section 1325(a)(5)(B)(ii) requires that the payments to secured creditors have a "present value" equal to creditors' allowed secured claims. Bexar County should be allowed interest from the petition

date through the date of final payment at the statutory rate of 12% per annum. See 11 U.S.C. §511.

WHEREFORE, based on the foregoing, Bexar County respectfully requests the Court enter an Order denying confirmation of the Debtor's Plan unless and until the Debtor amends its Plan to provide for the claim of Bexar County in the amount of \$7,745.45 to be paid through the Plan pro-rata with interest at the rate of 12% per annum or to bifurcate and for such other relief to which it is entitled.

Respectfully submitted,

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By: /s/ Don Stecker  
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Attorney for Bexar County

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of *Bexar County's Objection to Confirmation of Debtor's Chapter 13 Plan* was served this 23rd day of August, 2013, by First Class Mail upon the following:

Debtor:

Christina A. Moreno  
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San Antonio, TX 78233

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/s/ Don Stecker

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