

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In RE:**

Jennifer Louise Robinson

**Debtor(s)**

§

§ Case No.: 24-33060

§

§ Chapter: 13

§

**NOTICE OF DEBTOR(S)' INTENTION TO STRIP YOUR LIEN**

Notice to: **JP Morgan Chase Bank NA**

Regarding: Your lien that is alleged to be secured by the following real property:  
3111 Longhorn Circle, Manvel, TX 77578,

Priority of  
the Lien  
that Will  
be Stripped: JP Morgan Chase (second mortgage)

Jennifer Louise Robinson proposes a chapter 13 plan that terminates your lien secured by the property located at 3111 Longhorn Circle, Manvel, TX 77578. The proposed plan alleges that the value of the property is less than the amount owed on all liens that are senior in priority to your lien.

You must file any objection to the termination of your lien within 28 days of the date of this notice. If you fail to do so, the Bankruptcy Court may approve the plan without further notice. If you do object, you must appear at the hearing on confirmation of the proposed plan.

**The hearing is scheduled for 10/10/2024 at the United States Courthouse, located at 515 Rusk Street, Houston, Texas 77002, in Courtroom number 403.**

You are urged to review the entire plan. The provision of the plan that would terminate your lien is set forth below:

- 4C. The following table sets forth the treatment of certain classes of secured creditors holding a claim secured only by a security interest in real property that is the debtor(s)' principal residence. The Debtor alleges that the total amount of debt secured by liens that are senior in priority to the lien held by **JP Morgan Chase Bank NA** exceeds the total value of the principal residence. Accordingly, the claim will be paid distributions only as an unsecured claim.

Upon the debtor(s) completion of all payments set forth in this plan, the holder of the lien is required to execute a full and unequivocal release of its liens, encumbrances and security interests secured by the principal residence and to provide a copy of the release to the debtor(s)

and their counsel. Notwithstanding the foregoing, the holder of a lien that secures post-petition homeowners' association fees and assessments will be allowed to retain its lien, but only to secure (i) post-petition assessments; and (ii) other post-petition amounts, such as legal fees, if such other post-petition amounts are (x) incurred with respect to post-petition fees and assessments; and (y) approved by the Court, if incurred during the pendency of the bankruptcy case.

Name of Holder of Lien to which this provision applies	<b>JP Morgan Chase Bank NA</b>	
Address of Principal Residence	3111 Longhorn Circle, Manvel, TX 77578, .	
Debtor's Stated Value of Principal Residence	<b>\$548,600.00</b>	
Description of all Liens Senior in Priority (List Holder and Priority)	Estimated Amount Owed on This Lien	
<b>JP Morgan Chase c/o Select Portfolio Servicing</b>	<b>\$715,551.53</b>	
Total Owed-- All Senior Liens	<b>\$715,551.53</b>	

This paragraph 4C will only be effective if the debtor(s) do each of the following:

- Mail a "Lien Stripping Notice", in the form set forth on the Court's website, to the holder of the lien that is governed by this paragraph 4C. The Lien Stripping Notice must be mailed in a separate envelope from any other document.
- File a certificate of service reflecting that the Lien Stripping Notice was mailed by both certified mail, return receipt requested and by regular US mail to the holder of the lien at all of the following addresses, with the mailings occurring not later than 30 days prior to the hearing on this plan:
  - The address for notices shown on any proof of claim filed by the holder.
  - Any attorney representing the holder who has filed a request for notice in this bankruptcy case.
  - If no address for notices is given on a proof of claim filed by the holder, on the last known address of the holder.

**CERTIFICATE OF SERVICE**

On **08/21/2024**, a copy of this notice was sent by certified mail, return receipt requested where indicated, and by regular US mail to each of the following:

US Trustee  
515 Rusk, #3516  
Houston, TX 77002

Tiffany Castro  
Chapter 13 Trustee  
9821 Katy Freeway, Suite 590  
Houston, Texas 77024

Robinson, Jennifer Louise  
3111 Longhorn Circle  
Manvel, TX 77578

Deutsche Bank National Trust Co  
as Trustee for Long Beach Mortgage Loan Trust  
700 Kansas Lane, MC 800  
Monroe, LA 71203-4774

**Via First Class Mail and Certified Mail, return receipt requested**  
**9589 0710 5270 1291 1395 20**

Select Portfolio Servicing as servicer for Deutsche Bank  
c/o Michael Zientz  
Parkway Office Center, Ste 900  
14160 Dallas Pkwy  
Dallas, TX 75254

**Via First Class Mail and Certified Mail, return receipt requested**  
**9589 0710 5270 1291 1395 37**

Date: August 21, 2024

/s/ Eric Southward  
Eric Southward  
S. Dist. Tx. No. 777564  
Attorney for Debtor  
Busby & Southward  
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Houston, TX 77022  
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