

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:	Jerome Alonso Cushmeer)	
)	19 B 04787
)	
	Debtor(s),)	Judge A. Benjamin Goldgar
)	

Notice of Motion / Certificate of Service

Jerome Alonso Cushmeer
7203 S St Lawrence Ave
Chicago, IL 60619

U.S. Trustee
Via the clerk's electronic filing procedures

Please take notice that on **April 9, 2019** at 10:00 A.M., I shall appear in Courtroom 642 of the Dirksen Federal Building, 219 South Dearborn, Chicago, Illinois, and present the attached Motion to Dismiss, a copy of which is hereby served upon you.

The undersigned certifies that a copy of the foregoing Notice of Motion was served to the above listed persons by placing a copy of same in the US mail, first class postage prepaid and/or as addressed and by the method indicated above on March 21, 2019.

Marilyn O Marshall,
Standing Trustee

/s/ O. Anthony Olivadoti

Office of the Chapter 13 trustee
Marilyn O Marshall
224 S. Michigan Ave.
Suite 800
Chicago, IL 60604
(312) 431-6533

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Motion to Dismiss Case with 180 Day Bar

COMES NOW Marilyn O Marshall, Standing Trustee, pursuant to Section 1307(c)(1), §349, of the Bankruptcy Code and requests that this case be dismissed with for abuse under §349 and with a 180 day bar to re-filing, and in support, states as follows:

1. This current petition for relief under Chapter 13 of Title 11 USC was filed on February 25, 2019. This is a core proceeding under 28 USC §157.
2. Debtor's case history follows:
 - a) 18-20909, Ch13 Filed July 26, 2018, Dismissed for Failure to File Documents 8/28/18.
 - b) 18-27591 Ch13 Filed October 1, 2018, Dismissed for Failure to File Documents 11/13/18.
 - c) 18-32364 Ch13 Filed November 19, 2018, Dismissed for Failure to File Documents 1/08/19.
3. The debtor has serial filed cases to the point that no stay exists.
4. Debtor receive required credit counseling on February 26, 2019, after the case was filed. Debtor is not an eligible debtor in this case.
5. Debtor has filed 4 cases in less than 6 months and has yet to pay a single filing fee. Debtor continues to abuse the bankruptcy system. This case was filed in bad faith.

WHEREFORE, Trustee requests that this Court dismiss this case for cause with, barring the Debtor from re-filing a subsequent case for 180 Days, and for any and all other relief this Court deems just and proper.

Respectfully Submitted,
Marilyn O Marshall

/s/ O. Anthony Olivadoti

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