

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS**

In re

Chapter 11
Case No.

Debtor

**MOTION TO CONDITIONALLY APPROVE AND TO COMBINE THE HEARING
ON FINAL APPROVAL OF THE DISCLOSURE STATEMENT AND CONFIRMATION OF THE PLAN OF
REORGANIZATION OF SMALL BUSINESS DEBTOR**

To the Honorable _____, Bankruptcy Judge:

Debtor _____, Debtor-in-Possession (the "Debtor") in the above-named case, moves the Court to conditionally approve the Disclosure Statement and to combine the hearing on final approval of the adequacy of the Debtor's Disclosure Statement and Plan of Reorganization for Small Business Debtor and in support hereof respectfully represents:

1. On _____, the Debtor filed its chapter 11 petition herein.
2. On _____, the Debtor filed its Disclosure Statement and Plan of Reorganization for Small Business Debtor.
3. The Debtor has attached hereto as Exhibit A the proposed form of Order and Notice and as Exhibit B the proposed form of Ballot for Creditor Claims.

WHEREFORE, the Debtor prays that the Court (1) conditionally approve the Disclosure Statement, (2) schedule a combined hearing on final approval of the adequacy of the Disclosure Statement and confirmation of the Plan of Reorganization for Small Business Debtor, (3) approve the form of notice and form of ballot appended hereto, and (4) grant such other and further relief as this Court deems just and proper.

Respectfully Submitted,

/s/ _____
Printed Name
Address
BBO#
Telephone
Email