

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

In re:

Merida Mejicanos

Debtor

Chapter 13

Case No. 21-10600-KHK

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**WELLS FARGO BANK, N.A.'S RESPONSE TO DEBTOR'S OBJECTION TO PROOF  
OF CLAIM (NUMBER 4-1)**

NOW COMES the Creditor, Wells Fargo Bank, N.A. ("Wells Fargo") and responds to Debtor's Objection to Proof of Claim (Number 4-1) as follows:

1. Debtor's Objection to Proof of Claim (ECF 17) requested that "the claim of Wells Fargo Bank N.A. be treated as wholly unsecured."
2. Subsequently, Wells Fargo, desiring to resolve the matter without risk of further litigation and escalation of costs, filed an Amended Proof of Claim (Claim Number 4-2) amending the classification of the claim from secured to unsecured.
3. Since being advised that Wells Fargo was amending their claim to conform with the relief requested in their Objection to Proof of Claim, Debtor has refused to remove this matter from the Court's docket and has propounded discovery (see Certificate of Service of Discovery Documents, ECF 27).
4. This matter is moot. Debtors have been granted the relief requested and there remains nothing for the Court to adjudicate.<sup>1</sup>

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<sup>1</sup> Because the matter is moot, there is no need to respond individually to each of the 15 paragraphs of Debtor's Objection to Claim.

WHEREFORE Wells Fargo Bank, N.A., prays that the Debtor's Objection be denied as moot.

Date: July 9, 2021

Respectfully submitted,

/s/Daniel K. Eisenhauer  
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**CERTIFICATE OF SERVICE**

The undersigned states that on July 9, 2021, copies of the foregoing Response to Objection to Proof of Claim (Number 4-1) were filed with the Clerk of the Court using the ECF system, which will send notification of such filing to the following:

Thomas P. Gorman  
341 Dial 866-630-6853 Code: 6786636  
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Alexandria, VA 22314  
ch13alex@gmail.com  
*Bankruptcy Trustee*

Robert R. Weed  
Law Offices Of Robert Weed  
5019 C Backlick Rd.  
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*Debtor's Attorney*

and I hereby certify that I have caused to be mailed by first class mail, postage prepaid, copies of the foregoing Response to Objection to Proof of Claim (Number 4-1) to the following non-ECF participants:

Merida Mejicanos  
20069 Crew Square  
Ashburn, VA 20147  
*Debtor*

/s/Daniel K. Eisenhauer  
Daniel K. Eisenhauer, Esquire