REQUIRED STATEMENT TO ACCOMPANY
ALL MOTIONS TO MODIFY STAY

All Cases: Debtor(s) Conseco Finance Servicing Corp., f/k/a Green Tree Financial Servicing Corp. Case No. _____ Chapter ____

All Cases: Moving Creditor LDR, LLC Date Case Filed 6/4/03

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed _____

Chapter 7: _____ No-Asset Report Filed on _____
_____ No-Asset Report not Filed, Date of Creditors Meeting _____

1. Collateral
   a. Home _____
   b. Car _____ Year, Make and Model _____
   c. Other _____

2. Balance Owed as of Petition Date $ xx Not seeking money judgment

3. Estimated Value of Collateral (must be supplied if motion alleges no equity) $ _____

4. Default
   a. Pre-Petition Default
      Number of months _____ Amount $ _____

   b. Post-Petition Default
      i. On direct payments to the moving creditor
         Number of months _____ Amount $ _____

      ii. On payments to the Standing Chapter 13 Trustee
         Number of months _____ Amount $ _____

5. Other Allegations
   a. Lack of Adequate Protection § 362(d)(1)
      i. No insurance _____
      ii. Taxes unpaid _____ Amount $ _____
      iii. Rapidly depreciating asset _____
      iv. Other _____

   b. No Equity and not Necessary for an Effective Reorganization § 362(d)(2) _____

   c. Other "Cause" § 362(d)(1) _____
      i. Bad Faith _____
      ii. Multiple filings _____

Date: 8/27/04

Counsel for Movant

Revised 7/29/04