

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

IN RE:

	§	
	§	
Ernest J. Harris	§	
xxx-xx-5607	§	CASE NO. 03-44826-H4-13
Mattie J. Harris	§	CHAPTER 13
xxx-xx-1281	§	
DEBTORS	§	

**MOTION FOR DISCLOSURE
AND FOR DETERMINATION OF ALLOWABLE FEES AND COSTS**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 20 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

COMES NOW, Ernest J. Harris and Mattie J. Harris, Debtors, and request specific disclosure of post-petition fees and costs assessed to the Debtors mortgage account and further request the opportunity to review and object to any of the post-petition charges to the Debtors' mortgage account.

1. Debtors filed their chapter 13 proceeding on October 16, 2003.
2. Debtors have a mortgage serviced by Saxon Mortgage Services Inc.
3. Debtors request specific and full disclosure of the following:
 - Date and amount of all attorney fees assessed against the Debtors' mortgage account post-petition;
 - Date and amount of all costs assessed against the Debtors' mortgage account post-petition;
 - Date and amount of all other fees and expenses assessed against the Debtors' mortgage account post-petition;
 - Identification of all parties paid attorney fees assessed to the Debtors' mortgage account

post-petition;

A copy of all fee agreements regarding payment of attorney fees post-petition;

Time records which support attorney fees assessed against the Debtors' mortgage account post-petition;

Statement from all attorney's receiving post-petition payment as to what payments have heretofore been made or promised for services rendered or to be rendered in connection with this case;

Identification of the source of any and all payments or promises of payment of attorney fees assessed to the Debtors' mortgage account post-petition;

Description of any agreement or understanding to share attorney fees or costs among entities;

Production of a complete transaction history of the Debtors' mortgage account, including all suspense account transactions, from loan inception through the day of production, with a detailed description of all fee codes;

Production of the Master Pooling And Servicing Agreement, Sub-Servicing, Contingency Servicing, Special Servicing and Back-up Servicing Agreement with respect to the Debtors Mortgage Account.

4. Upon production of the requested information the Debtors request the Court to determine the allowability of the assessed charges.

WHEREFORE, Debtors request the court to compel the disclosure of the requested information and to set a further hearing on the allowance of any assessed fees or costs which occurred post-petition and to grant them such other and further relief, at law or in equity to which they may be justly entitled.

Dated: June 21, 2007.

Respectfully submitted,

By: /s/Johnie J. Patterson

Johnie J. Patterson
SBN #15601700
jjp@walkerandpatterson.com
ATTORNEY FOR DEBTORS

OF COUNSEL:
Walker & Patterson, P.C.
P.O. Box 61301
Houston, TX 77208-1301
(713)956-5577 Phone
(713)956-5570 Fax

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *Motion For Disclosure* was served on all parties entitled to notice, as evidenced by the list below, by first class, United States mail, postage prepaid or by electronic transmission, on June 21, 2007.

/s/Johnie J. Patterson
Johnie J. Patterson

June A. Mann
Mann & Stevens, P.C.
Suite 560
550 Westcott
Houston, TX 77007

Saxon Mortgage Services Inc.
c/o Corporation Service Company
D/B/A+
701 Brazos Street, Suite 1050
Austin, TX 78701

Saxon Mortgage Services, Inc.
4708 Mercantile Drive North
Fort Worth, TX 76137

Saxon Mortgage Services, Inc.
1270 Northland Drive
Suite 200
Mendota Heights, MN 55120

Ernest J. Harris
4903 Cotton Ridge Trail
Houston, TX 77053

Mattie J. Harris
4903 Cotton Ridge Trail
Houston, TX 77053

David Peake
Suite 430
9660 Hillcroft
Houston, TX 77096

United States Trustee
Suite 3516
515 Rusk
Houston, TX 77002