

FILED: May 27, 2026

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 25-1048
(1:24-cv-00288-MSN-WBP)

CHRISTOPHER M. COOK,

Debtor – Appellant,

v.

CHAPTER 13 TRUSTEE,

Trustee – Appellee.

NATIONAL ASSOCIATION OF CONSUMER BANKRUPTCY ATTORNEYS;
NATIONAL CONSUMER BANKRUPTCY RIGHTS CENTER,

Amici Supporting Appellant.

O R D E R

The court amends its opinion filed April 13, 2026, as follows:

On the cover page, “In re: CHAPTER 13 TRUSTEE” is removed.

On page 5, in the second paragraph, the citation and corresponding text are

corrected to read:

For example, a trustee may object to a debtor's proposed plan under what is known as the "liquidation test." The liquidation test, or best interests of the creditors test, provides that a plan may only be confirmed over an objection if the debtor's creditors receive payments having a present value "not less than the amount that would be paid on [their] claim[s] if the estate of the debtor were liquidated under" a Chapter 7 bankruptcy. *Id.* § 1325(a)(4).

On page 6, the phrase "because Cook's creditors would fare no better under the proposed plan than they would under a hypothetical Chapter 7 plan" is removed from the penultimate sentence of the third paragraph.

For the Court

/s/ Nwamaka Anowi, Clerk