I want to request retaining the current structure of all chapters filing the same "22" form number with a different letter suffix, i.e. something like this:

Chapter 7 B22A becomes B109A-1 and B109A-2, or better B122A-1 and B122A-2 Chapter 11 B22B becomes B109B Chapter 13 B22C becomes B109C-1 and B109C-2

Tens of thousands of Attorneys are used to this A,B,C concept for chapters 7,11,13. When they see a list of Case PDFs to be filed they know they should see a Form22x.PDF in every chapter but 12. (Many districts require 22 to be filed separately.) I know the three B22 forms have different functions, but they do work almost identically. In the new 2014 versions an effort was made to make the line numbers identical for the 3 forms, that makes it possible to refer to many lines as simply "Form B22" and not need to specify A or C. Changing all the "Form 22" documentation references to "Form 108, 109 or 110" will be painful. The B6 ABCDEFGHIJ suffix letter is being retained and some of those forms are unrelated to the others.

There will be enough confusion in 2015 with every form changing format. Nearly all the new B1xx forms retain the same number so the current Bxx becomes + 100 = B1xx (B6+100=B106). The obvious reason for this is to reduce confusion as everyone knows those form numbers. This also makes it easy to relate existing articles, documents and opinions that refer to old form numbers, it's easy to +100 to find the new form number. The B22 form is the biggest, most complex, and newest form with more written about it on the web than any other form.

The B22x forms should retain the same number structure, and ideally number them B122x. There will be nearly zero new learning and zero confusion. That makes it possible for B8 to become B108. Chapter 7 is filed the most and all Attorneys know they need a Form 8. Changing it to B112 will create confusion.

There will be a 6 month to 5 year overlap where cases filed prior to 12/2015 will file the current forms. It will reduce confusion if as many form numbers as possible are simply +100.

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