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FILED
04 MAR 15 AM 8:50
REG. CLERK
GABRIEL S. BURKE
IDAHO

UNITED STATES BANKRUPTCY COURT
DISTRICT OF IDAHO

IN RE:) Case NO. 03-21652
)
GERALD LINDSEY and) OBJECTION TO MOTION
ONA LINDSEY,) TO AMEND VOLUNTARY
Debtors.) PETITION; REQUEST FOR
) CONTINUANCE; and REQUEST
) FOR NOTICE TO ALL INTERESTED
) AND PROPER PARTIES

COMES NOW, the above named Debtors and hereby object to Trustee's Motion to Amend Voluntary Petition. This objection is based upon the following representations and the Declaration of Brit Groom filed herewith.

1. There is no evidence to support the speculation by the Trustee that the Debtors now or ever owned or controlled the trusts named in Trustee's Motion.
2. Trustee has failed to give notice of the hearing on his Motion to Amend Petition to all interested/ affected parties namely the trusts and its administrator and/or Trustee's.

OBJECTION TO MOTION
TO AMEND PETITION

3. Debtors have had only one business day to prepare for a hearing which will require extensive preparation, accumulation of evidence and the contacting of many witnesses.

4. Debtors request the hearing on the Trustee's motion be continued to allow Debtors to have adequate time to prepare .

5. Debtors further request that the Trustee be directed to give proper notice to the subject trust administrators .

Dated this 14 day of March, 2004



Brit Groom, Attorney for
Debtors

CERTIFICATE OF SERVICE

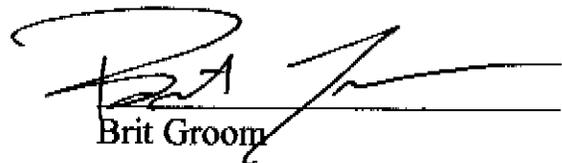
I hereby certify that on this 15 day of March, 2004, I served via the manner indicated below to the individuals indicated, a copy of the foregoing document.

Barry McHugh
Attorney for Trustee
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