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U.S. DISTRICT COURT
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REC'D FILED
CAMERON S. BURKE
CLERK IDAHO

Attorney for the Debtor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF IDAHO

IN RE:) Case NO. 03-21652
)
GERALD LINDSEY and) OBJECTION TO MOTION
ONA LINDSEY,) TO SHORTEN TIME
)
Debtors.)
)
_____)

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. The neither the Trustee nor his Counsel have demonstrated that there is an immediate need to hold the hearing on the Motion to Amend the Petition.
2. There is no evidence that Debtors have transferred any assets in the immediate or proximate past or that there any transfers taking place at the present

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MOTION TO SHORTEN TIME

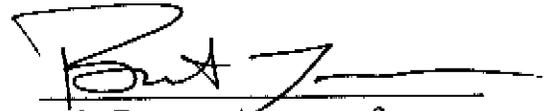
time. In 1994 as part of an estate planning program, Debtors transferred assets to Searchlight Trust and all transfers took place at that time.

3. The Trustee has failed to give notice to all proper and interested parties in this proceeding. Debtors have not claimed an ownership interest in the trust or its assets and have provided the name, telephone number and mailing address of the Trust to the Trustee. The Trustee has failed to notify the Trustee of the subject trusts of either of the Trustee's Motions.

4. Debtors do not dispute that the Trustee has an obligation and right to litigate any issue he deems in the best interest of the Debtor's Estate, however, said litigation should be in an orderly fashion and not done in haste and with the intent to harass and intimidate the parties concerned.

5. The subject of the Trustee's Motion to Amend Petition is a complex issue involving several trusts which have been created and managed without Debtors participation or knowledge. Such an action will require extensive discovery by the trustee to prove his mere assertions as contained in his present Motion and Declaration. This is not the type of litigation that is best done with two working days notice.

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
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