Barry McHugh
ELSAESSER JARZABEK ANDERSON
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Attorneys for Chapter 7 Trustee

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UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF IDAHO

In Re:	)	Case No. 03-21652
	)	
GERALD & ONA LINDSEY,	)	SECOND MOTION TO AMEND
	)	THE VOLUNTARY PETITION
Debtors	)	
	)	
	)	

COMES NOW Ford Elsaesser, the Chapter 7 Trustee, by and through his attorney of record, Barry McHugh of ELSAESSER JARZABEK ANDERSON MARKS ELLIOTT & MCHUGH, CHTD., and hereby moves the Court for an order amending the Voluntary Petition filed in this matter pursuant to Bankruptcy Rule 1009 and Rule 9014 to add to the Voluntary Petition entities which are owned by or under the control of, or who are alter egos for the Debtors in this matter, including:

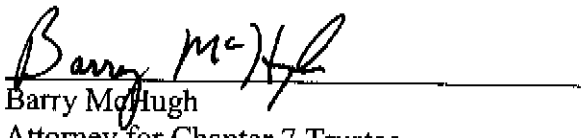
Mountain Property Management and Trust Company
National Holding Trust
Equitable Financial Services

This motion is supported by the Memorandum in Support of Second Motion to Amend the Voluntary Petition, and the Affidavit of Barry McHugh in Support of Second Motion to Amend the Petition and Motion for Turnover of Property, filed herewith.

ORIGINAL

DATED this 23rd day of March, 2004.

ELSAESSER JARZABEK ANDERSON
MARKS ELLIOTT & MCHUGH, CHTD.



Barry McHugh
Attorney for Chapter 7 Trustee

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of March, 2004, a true and correct copy of the foregoing SECOND MOTION TO AMEND THE VOLUNTARY PETITION was served upon the following via U.S. Mail, first class, postage prepaid.

Ford Elsaesser Chapter 7 Trustee P.O. Box 2220 Sandpoint, ID 83864	U.S. Trustee 304 N. 8th Street, Rm 347 Boise, ID 83702
Brit D. Groom Attorney at Law P.O. Box 218 Grangeville, ID 83530	Warren Derbidge US Attorney's Office 877 w. Main, Ste. 201 Boise, ID 83702
Sheila R. Schwager Hawley Troxell P.O. Box 1617 Boise, ID 83701-1617	Gerald & Ona Lindsey HC01 Box 109A White Bird, ID 83554
Mountain Property Management and Trust Company HC01 Box 109B White Bird, ID 83554	National Holding Trust HC01 Box 109B White Bird, ID 83554
Equitable Financial Services HC01 Box 109B White Bird, ID 83554	

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