

RICHARD J. HAYDEN  
RICHARD J. HAYDEN, P.S.  
1427 Sixth Avenue  
Spokane, WA 99204-3303  
(509) 624-1111

U.S. COURT

FEB 17 2004 11:57

FILED N  
DANIEL S. BURKE

CLERK OF DISTRICT COURT  
DISTRICT OF IDAHO

Attorney for FORD MOTOR CREDIT COMPANY

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF IDAHO, TWIN FALLS

In re:  
LYNN KETTERLING dba  
KETTERLING FARMS and  
JEANNE KETTERLING,

Chapter 7  
NO. 03-41318

CERTIFICATE OF MAILING

Debtor.

I HEREBY CERTIFY under penalty of perjury that on the 13<sup>th</sup>  
day of FEBRUARY, 2004, I mailed a true and correct copy of the  
foregoing Declaration of JOHN SCHAEFFER upon D. BLAIR CLARK, P.O.  
BOX 2773, BOISE, ID 83701-2773 and R. SAM HOPKINS, P.O. BOX  
3014, POCATELLO, ID 83201-3014 by depositing the same in the U.S.  
mail, postage prepaid, addressed to the above-referenced parties.

*Step Freatman*

STEFANIE FREATMAN

DECLARATION OF  
JOHN SCHAEFFER  
AND CERTIFICATE OF MAILING

4

ORIGINAL

105  
RICHARD J. HAYDEN, P.S.  
1427 West Sixth Avenue  
Spokane, WA 99204-3303  
(509) 624-1111  
Facsimile (509) 456-8654  
A Professional Service Corporation

RICHARD J. HAYDEN  
RICHARD J. HAYDEN, P.S.  
1427 Sixth Avenue  
Spokane, WA 99204-3303  
(509) 624-1111

Attorney for FORD MOTOR CREDIT COMPANY

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF IDAHO, TWIN FALLS

In re:

LYNN KETTERLING dba  
KETTERLING FARMS and  
JEANNE KETTERLING  
  
Debtors.

Chapter 7  
NO. 03-41318

DECLARATION OF  
JOHN SCHAEFFER  
IN SUPPORT OF RELIEF

COMES NOW, JOHN SCHAEFFER under penalty of perjury pursuant to federal law, and states as follows:

My name is JOHN SCHAEFFER, and I am over the age of eighteen (18) and make this declaration based upon personal knowledge.

1. DEFAULT. I am a bankruptcy manager in charge of the debtor's file with FORD MOTOR CREDIT COMPANY. I am employed by FORD MOTOR CREDIT COMPANY (hereinafter "FMCC"). FMCC has a secured interest in one 1999 FORD 4X4 EXPEDITION VIN# 1FMPU18L3XLC47394;

2. COMPETENCY. I am thoroughly familiar with the file and

DECLARATION OF  
JOHN SCHAEFFER  
AND CERTIFICATE OF MAILING

RICHARD J. HAYDEN, P.S.  
1427 West Sixth Avenue  
Spokane, WA 99204-3303  
(509) 624-1111  
Facsimile (509) 456-8654  
A Professional Service Corporation

have reviewed the file before making this declaration. It is my testimony that as of the date of this declaration, the debtors on this contract are 6 months in default in the amount of \$ 2947.00 to FMCC from 9/10/03 to 2/10, 2004. The debtor owes a total net amount of \$ 7497.97 plus fees and costs, to FMCC.

2. CURE. As of the date the motion was filed, there has been no full cure of the arrearage.

3. VALUE OF COLLATERAL. I assert that, based upon the value of the collateral and the fact that certain mobile collateral declines over time and can decline quite precipitously, FMCC believes that it is not adequately protected. The collateral is depreciating. The current value that is arrived at is \$16,825.00.

4. EQUITY. The debtor is believed to have equity in the collateral.

5. STATEMENT OF ACCOUNTING. Attached is exhibit 1 hereto is a recent accounting statement for this account as of the date of execution of this declaration.

I declare, under penalty of perjury pursuant to federal law, that the above is true and correct, to my personal knowledge and belief.

DATED this 12<sup>th</sup> day of February, 2004.

  
JOHN SCHAEFFER

DECLARATION OF  
JOHN SCHAEFFER  
AND CERTIFICATE OF MAILING

3

RICHARD J. HAYDEN, P.S.  
1437 West Sixth Avenue  
Spokane, WA 99204-3303  
(509) 624-1111  
Facsimile (509) 456-8654  
A Professional Service Corporation

## STATEMENT OF ACCOUNT

Lynn Ketterling  
Acct.: 4806300000020866914  
1999 FORD EXPEDITION  
1FMPU18L3XLC47394

|                               |         |
|-------------------------------|---------|
| 09/10/99 7080 AUTO DEBIT PAYM | 555.90  |
| 10/11/99 7080 AUTO DEBIT PAYM | 555.90  |
| 11/10/99 7080 AUTO DEBIT PAYM | 555.90  |
| 12/10/99 7080 AUTO DEBIT PAYM | 555.90  |
| 01/10/00 7080 AUTO DEBIT PAYM | 555.90  |
| 02/10/00 7080 AUTO DEBIT PAYM | 555.90  |
| 03/10/00 7080 AUTO DEBIT PAYM | 555.90  |
| 04/10/00 7080 AUTO DEBIT PAYM | 555.90  |
| 05/10/00 7080 AUTO DEBIT PAYM | 555.90  |
| 06/12/00 7080 AUTO DEBIT PAYM | 555.90  |
| 07/10/00 7080 AUTO DEBIT PAYM | 555.90  |
| 08/10/00 7080 AUTO DEBIT PAYM | 555.90  |
| 09/11/00 7080 AUTO DEBIT PAYM | 555.90  |
| 10/10/00 7080 AUTO DEBIT PAYM | 555.90  |
| 11/10/00 7080 AUTO DEBIT PAYM | 555.90  |
| 12/11/00 7080 AUTO DEBIT PAYM | 555.90  |
| 01/10/01 7080 AUTO DEBIT PAYM | 555.90  |
| 02/12/01 7080 AUTO DEBIT PAYM | 555.90  |
| 03/12/01 7080 AUTO DEBIT PAYM | 555.90  |
| 04/10/01 7080 AUTO DEBIT PAYM | 555.90  |
| 05/10/01 7080 AUTO DEBIT PAYM | 555.90  |
| 06/11/01 7080 AUTO DEBIT PAYM | 555.90  |
| 07/10/01 7080 AUTO DEBIT PAYM | 555.90  |
| 08/10/01 7080 AUTO DEBIT PAYM | 555.90  |
| 09/10/01 7080 AUTO DEBIT PAYM | 555.90  |
| 10/10/01 7080 AUTO DEBIT PAYM | 555.90  |
| 11/12/01 7080 AUTO DEBIT PAYM | 555.90  |
| 12/10/01 7080 AUTO DEBIT PAYM | 555.90  |
| 01/10/02 7080 AUTO DEBIT PAYM | 555.90  |
| 02/11/02 7080 AUTO DEBIT PAYM | 555.90  |
| 03/11/02 7080 AUTO DEBIT PAYM | 555.90  |
| 04/10/02 7080 AUTO DEBIT PAYM | 555.90  |
| 05/10/02 7080 AUTO DEBIT PAYM | 555.90  |
| 06/10/02 7080 AUTO DEBIT PAYM | 555.90  |
| 07/10/02 7080 AUTO DEBIT PAYM | 555.90  |
| 08/12/02 7080 AUTO DEBIT PAYM | 555.90  |
| 09/10/02 7080 AUTO DEBIT PAYM | 555.90  |
| 10/10/02 7080 AUTO DEBIT PAYM | 555.90  |
| 11/11/02 7080 AUTO DEBIT PAYM | 555.90  |
| 12/10/02 7080 AUTO DEBIT PAYM | 555.90  |
| 01/10/03 7080 AUTO DEBIT PMT  | 555.90  |
| 02/10/03 7080 AUTO DEBIT PMT  | 555.90  |
| 02/19/03 9080 RETURN - R01    | -555.90 |
| 03/12/03 8080 REGULAR PAYMENT | 555.90  |
| 03/28/03 8080 REGULAR PAYMENT | 27.80   |
| 05/13/03 8080 REGULAR PAYMENT | 556.00  |
| 06/23/03 8080 REGULAR PAYMENT | 556.00  |
| 10/01/03 8080 REGULAR PAYMENT | 300.00  |
| 10/31/03 8080 REGULAR PAYMENT | 300.00  |
| 12/01/03 8080 REGULAR PAYMENT | 300.00  |
| 12/29/03 8080 REGULAR PAYMENT | 300.00  |
| 01/28/04 8080 REGULAR PAYMENT | 300.00  |