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U.S. COURTS
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C. W. CHRISTENSEN
COURT REPORTER

Attorneys For: Western Farm Service, Inc.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF IDAHO

In the Matter of)	Bankruptcy No. 03-41318
)	
LYNN KETTERLING AND JEANNE)	OBJECTION TO DEBTORS' MOTION
KETTERLING, d/b/a Ketterling)	TO ENTER INTO FARM SERVICE
Farms,)	PROGRAMS
)	
Debtors.)	
_____)	

COMES NOW Western Farm Service, Inc., a party in interest of Debtors, and objects to the Motion To Enter Into Farm Service Programs dated October 29, 2003, for the reasons and on the grounds that:

1. The Motion fails to disclose whether or not the Debtors intend to turn over to the Trustee for distribution to parties in interest any funds received under the Farm Service Agency programs, including those pertaining to sugar beet disaster programs and Commodity Credit Corporation programs.

2. The Motions fails to disclose what conditions, restrictions, and/or requirements will be imposed upon the Debtors, or reorganized debtors, if the Motion is granted.

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3. The Motion fails to specify how the funds will be distributed to parties in interest and the role that the Trustee, Forrest P. Hymas, will play in administering the funds.

4. Western Farm Service, Inc. claims a perfected security interest in any and all governmental program payments under its underlying security documentation; the Motion fails to address the security interest of Western Farm Service, Inc.

DATED This 11th day of November, 2003.

CRAIG W. CHRISTENSEN, CHARTERED

By 
Attorneys for Western Farm Service,
Inc.

CERTIFICATE OF MAILING

I hereby certify that on this 11th day of November, 2003, a true and correct copy of the foregoing Objection to Debtors' Motion To Enter Into Farm Service Programs was mailed, postage prepaid thereon, to the following:

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