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U.S. COURTS

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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF IDAHO

In re: )  
) Case No. 00-00914  
KENNETH and DEBRA McRAE )  
) MOTION FOR 2004 EXAMINATION  
)  
Debtor. )  
\_\_\_\_\_ )

COMES NOW the Trustee, and moves the Court for the 2004 examination of Alan McRae, Rey McRae, and Ken McRae, to be held at the offices of Ringert Clark Chartered at such times as are available after service of subpoena therefore.

This Motion is made as and for the following reasons:

1. Counsel for the Trustee and the Trustee have received various documents indicating that Debtors may have concealed substantial amounts of farm equipment, have undervalued equipment, and perhaps, other assets. Rey McRae is the father of Debtor Kenneth McRae, and Alan McRae is Debtor's brother.

2. Rey McRae is a debtor in a chapter 12 case pending in this Court. Ron Schoen is the trustee. Mr. Crawford and Mr. Schoen have discussed this matter. Rey McRae disclosed that he had no equipment. However, Debtor Ken McRae has informed Debtor that his father had all of the equipment for the farming enterprise. The trustee has investigated this matter

MOTION FOR 2004 EXAMINATION--1

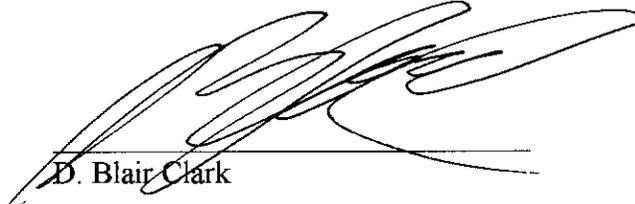
further, and has found that the Owyhee County assessor has a great deal of farm equipment listed in the name of Alan McRae, who also uses the name 'McRae Farms.' Alan McRae has in fact picked up farm equipment allegedly belonging to Ken McRae from third parties.

The circumstances surrounding this case warrant the taking of such examinations forthwith.

WHEREFORE, Debtor moves for the taking of such examinations as aforesaid.

DATED this 2<sup>nd</sup> day of May, 2001.

RINGERT CLARK CHARTERED



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