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2018

Attorney for C. Barry Zimmerman,
Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF IDAHO

IN RE:

FRANK L. CHAPIN and
SYDNEY L. GUTIERREZ-CHAPIN,

Debtors.

CASE NO. 02-20218

**MOTION FOR TURNOVER AND
ACCOUNTING**

COMES NOW, C. Barry Zimmerman, Chapter 7 Trustee, by and through II. James Magnuson, Trustee's attorney of record, and moves for an order ordering Debtors to turn over assets of the estate and for an accounting of the payments received. The motion seeks an order of turnover for all rents received by or paid to Debtors at any time post-petition relating to the Glabb Ranch, Jachetta property, Linden property, Home Place properties and Dunromin property and for an accounting of all said rents.

Trustee further moves for an order requiring the Debtors to turn over all banking records, including bank statements, checking and deposit records in the name of any of the following:

Frank Chapin
Sydney L. Gutierrez-Chapin
Frank Chapin P.A.
Sand F LLC; and
Financial Management Services, Inc.

23

DATED this 28 day of March, 2004.



H. JAMES MAGNUSON
Attorney for C. Barry Zimmerman,
Chapter 7 Trustee

CERTIFICATE OF MAILING

I hereby certify that a true and correct copy of the foregoing was mailed by first-class prepaid mail on the 26 day of March, 2004.

John R. Rizzardi
Cairncross & Hempelmann, P.S.
524 Second Avenue, Suite 500
Seattle, WA 98104-2323

Frank L. Chapin
Sydney L. Gutierrez-Chapin
319 Church Street
Sandpoint, ID 83864

U. S. Trustee Office
304 N. 8th Street, Room 347
Boise, ID 83702


