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U.S. COURTS  
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 REC'D \_\_\_\_\_  
 CAMERON S. BURKE  
 CLERK IDAHO

Attorneys for Bonner County

UNITED STATES BANKRUPTCY COURT  
 DISTRICT OF IDAHO

In re:	)	Bankruptcy Case No. 02-20218
	)	
FRANK L. CHAPIN and	)	CONDINTIONAL WITHDRAWAL
SYDNEY L. GUTIERREZ-CHAPIN,	)	OF OBJECTION TO PLAN OF
	)	REORGANIZATION
	)	
Debtor.	)	
_____	)	

COMES NOW, Bonner County, political subdivision of the State of Idaho, a secured creditor herein, by and through its undersigned attorney of record, and hereby conditionally withdraws its previously filed Objection to Confirmation on the following grounds and conditions:

1. That Bonner County has filed claim number one in this proceeding as a secured lien for delinquent tax liabilities in excess of \$4,300.00.
2. That neither the Debtor nor any creditor has filed an objection to Bonner County's secured proof of claim.
3. That Debtors' proposed Plan provided for Bonner County retaining its secured lien, however, only provided interest on the claim at the federal judgment interest rate.
4. That as a secured creditor, Bonner County was entitled to statutory interest pursuant

to Idaho Code §63-1001 at the rate of 1% per month or 12% per annum.

5. That counsel for Debtors have agreed to modify the treatment of Bonner County's claim by paying the delinquent tax amount in full together with accrued and accruing statutory interest.

6. Based upon representations of counsel, Bonner County has conditionally withdrawn its Objection to Confirmation and agreed to vote in favor of the Plan.

WIIEREFORF, Bonner County withdraws its previously filed Objection on the terms and conditions as set forth herein.

Dated this 7<sup>th</sup> day of April, 2003.

GERY W. EDSON, P.A.,

By   
Gery W. Edson  
Attorney for Bonner County

CERTIFICATE OF SERVICE

I hereby certify that on this 17<sup>th</sup> day of April, 2003 I caused to be served a true and correct copy of the foregoing to the following parties and by the method(s) indicated below:

Bruce A. Anderson  
ELSAESSER JARZABEK ANDERSON  
MARKS ELLIOTT & MCHUGH, CHARTERED  
1400 Northwood Center Court, Suite C  
Coeur d'Alenc, ID 83861  
*Attorneys for Debtors*

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Attorney at Law  
1519 W. Broadway  
Spokane, WA 99201  
*Attorneys for Debtors*

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*Attorneys for creditor Frederick A. Leaf, M.D.*

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Maris Baltins  
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*Attorneys for creditor Frederick A. Leaf, M.D.*

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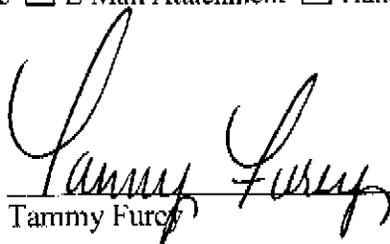
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*Attorneys for The Estate of Christina Leaf*

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Cheryl D. Piehl  
Bonner County Treasurer  
215 South First Avenue  
Sandpoint, ID 83864

U.S. Mail    Overnight Mail    Facsimile    E-Mail Attachment    Hand Delivery

  
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Tammy Furey