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UNITED STATES COURTS  
DISTRICT OF IDAHO

NOV 12 1997

M. REC'D  
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7 UNITED STATES BANKRUPTCY COURT  
8 FOR THE DISTRICT OF IDAHO  
9

10 In re: )  
11 ) Case No. 97-02722  
12 ) Chapter 13  
13 RAYMOND T. WARE and )  
14 RENDA E. WARE )  
15 Debtors. )  
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COMES NOW D.L. Evans Bank ("Bank") and objects to Debtors' Proposed Chapter 13 Plan, for the following reasons:

- 19 1. The Plan fails to account for the value of, or provide payment to, Bank on behalf  
20 of Bank's security interest in pre-petition accounts;
- 22 2. The Plan fails to account for the value of, or provide payment to, Bank on behalf  
23 of Bank's security interest in business equipment;
- 24 3. The Plan fails to recognize that all loans owed by Debtors to Bank are cross-  
25 collateralized and that treating Bank as oversecured on some loans and undersecured on other  
26 loans is not allowed by law.

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4. The Plan provides for payment to First Security Bank in the monthly amount of \$830.00 for 60 months pursuant to a purported lien on a commercial building. Bank believes that this purported lien is junior to Bank's lien on the same building, and Debtors' Plan may not provide for payment to First Security Bank unless and until provision is made to pay all of Bank's loans in full.

5. Bank rejects Debtor's Proposed Chapter 13 Plan.

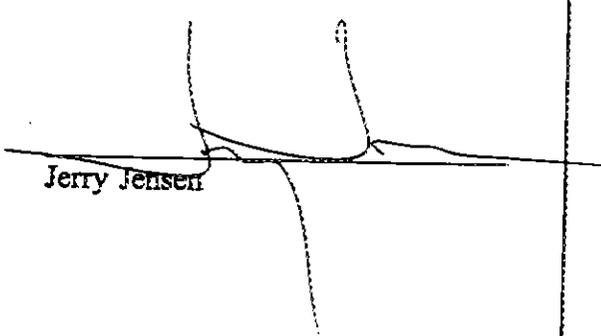
CERTIFICATE OF MAILING

I hereby certify that on this 11 day of Nov. ~~September~~, 1997, I served a copy of the foregoing OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN, by depositing same in the United States mail, postage prepaid, in an envelope, addressed to the following:

Brent T. Robinson  
LING, NIELSEN & ROBINSON  
P. O. 396  
Rupert, Idaho 83350

L.D. Fitzgerald  
P.O. Box 6199  
Pocatello, ID 83205-6199

Raymond and Renda Ware  
730 Sunrise North  
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Jerry Jensen