

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:)
)
Cristina Renee Hanson,) **Bky. No. 03-40673-NCD**
) Chapter 7
)
) **DEBTOR'S SUPPLEMENTAL**
) **RESPONSE TO TRUSTEE'S**
) **MOTION OBJECTING TO**
Debtor.) **EXEMPT PROPERTY**

TO: U.S. Bankruptcy Court; Julia A. Christians, Chapter 7 Trustee; Habbo G. Fokkena, U.S. Trustee; and any other party entitled to notice.

1. Cristina Renee Hanson, the debtor in this chapter 7 case, through her attorney, Craig W. Andresen, hereby submits the following supplemental response, in reply to the chapter 7 trustee's supplemental memorandum dated August 2, 2004.

2. If testimony is necessary at the hearing, the debtor, Cristina Hanson, 222 – 1st Street East, Milaca, Minnesota 56353, will testify. If factual issues are in dispute which would assist the court in the resolution of this matter, the debtor requests that the court schedule an evidentiary hearing, with an appropriate amount of time for discovery, and that the court consider converting this proceeding to an adversary proceeding.

3. The trustee's supplemental memorandum refers to the debtor's Exhibit C-1. This exhibit consists of a letter to the debtor from her personal injury attorney Greg Malush, dated April 27, 2004. The letter points out that the debtor must amend her bankruptcy petition to list the personal injury case. This letter is offered into evidence by the debtor to establish that once she received this letter, she acted immediately, through her attorneys, to inform the trustee of the existence of the asset. It is undisputed that

the trustee was notified by the debtor, through her attorneys, within a few days of the date of this letter, which was April 27, 2004. To summarize, the debtor states that she received this letter within a few days of April 27, 2004, and this was the first time that she became aware that her bankruptcy schedules were defective and did not correctly list the personal injury case. The letter is not offered for the assertion contained in paragraph 1 of the letter. The debtor was not aware that she had to amend her bankruptcy petition until April 2004. She does not remember being informed by Mr. Malush or anyone else in July 2003, that she needed to amend her bankruptcy petition. She states she met with Mr. Malush on July 15, 2003, about her injury case, and he informed her that she needed the bankruptcy to completely list the medical bills. She was not made aware of any need to amend the bankruptcy regarding her injury case.

Respectfully submitted,

August 3, 2004
Date

/e/ Craig W. Andresen
Craig W. Andresen, #186557
Attorney for Debtor
2001 Killebrew Dr., Suite 330
Bloomington, MN 55425
(952) 831-1995

VERIFICATION

I, **Cristina Renee Hanson**, the debtor herein, declare under penalty of perjury that the foregoing Supplemental Response is true and correct to the best of my knowledge.

August 3, 2004
Date

/e/ Cristina Renee Hanson
Debtor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

Cristina Renee Hanson

SIGNATURE DECLARATION

Debtor(s).

Case No. 03-40673-NCD

- PETITION, SCHEDULES & STATEMENTS
 CHAPTER 13 PLAN
 SCHEDULES AND STATEMENTS ACCOMPANYING VERIFIED CONVERSION
 AMENDMENT TO PETITION, SCHEDULES & STATEMENTS
 MODIFIED CHAPTER 13 PLAN
 OTHER (Please describe: DEBTOR'S SUPPLEMENTAL RESPONSE)

I, the undersigned debtor, ***make the following declarations under penalty of perjury:***

- The information I have given my attorney and provided in the electronically filed Supplemental Response, as indicated above, is true and correct; and
- I consent to my attorney electronically filing with the United States Bankruptcy Court my Response and Memorandum, together with a scanned image of this signature declaration.

Date: 8.2.04

x Cristina Hanson
Signature of Debtor or Authorized Representative

x _____
Signature of Joint Debtor

Cristina Hanson
Printed Name of Debtor or Authorized Representative

Printed Name of Joint Debtor

In re:

U.S. Bankruptcy Court
District of Minnesota

Cristina Renee Hanson,

UNSWORN DECLARATION
FOR PROOF OF SERVICE

Debtor(s):

Case No. 03-40673-NCD

I, Catherine E. Clausen, employed by Craig W. Andresen, attorney licensed to practice law in this court, with office address of 2001 Killebrew Dr., Suite 330, Bloomington, Minnesota 55425, declare that on August 3, 2004, I served the annexed Debtor's Supplemental Response to Trustee's Motion Objecting to Exempt Property upon each of the entities named below by facsimile transmission.

Habbo G. Fokkena, U.S. Trustee
(612) 664-5516

Julia A. Christians, Trustee
(612) 338-6651

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed: August 3, 2004.

Signed: Catherine E Clausen