

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA  
FOURTH DIVISION

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IN RE:

*Sally T. McNamee,*

Debtor(s).

**BKY 03-47275**

**TRUSTEE'S RESPONSE TO FEE  
APPLICATION BY ATTORNEY  
FOR DEBTOR(S)**

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TO: All parties in interest pursuant to Local Rule 9013-3:

1. Jasmine Z. Keller, the standing Chapter 13 Trustee (the "Trustee"), by her undersigned attorney, submits this response to the Notice of Hearing and Application for Compensation by Attorney for Debtor (the "Application").

2. The Court will hold a hearing on the Application on October 6, 2003, at 10:00 a.m., or as soon thereafter as counsel can be heard, in Courtroom 8 West, U.S. Courthouse, 300 South 4<sup>th</sup> Street, Minneapolis, Minnesota.

3. As of September 9, 2004, the Trustee has received \$1000.00 from the above-named debtor(s). The debtors are current in payments to the Trustee.

4. The Trustee has funds on hand in the amount of \$166.82 as of September 9, 2004.

7. Applicant's hourly rate is reasonable for an attorney with the attorney's level of experience. The time spent on this case was reasonably necessary for the proper representation of the debtors in this proceeding.

8. The Trustee's Counsel has reviewed the Application and the request for allowance of fees and expenses. Based on the fact that the Applicant is only seeking compensation and reimbursement of expenses in the amount of \$1876.00, the Trustee **does not oppose the Court's granting the relief requested.**

Dated : September 9, 2004

Respectfully submitted,

/e/ Thomas E. Johnson  
Thomas E. Johnson, #52000  
Margaret H. Culp, # 180609  
Counsel to Chapter 13 Trustee  
310 Plymouth Building  
12 South Sixth Street  
Minneapolis, MN 55402  
(612) 338-7591

## VERIFICATION

I, Thomas E. Johnson, employed by Jasmine Z. Keller, Chapter 13 Trustee, declare under penalty of perjury that the factual matters attested to in the foregoing are true and correct, to the best of my knowledge, information and belief.

Dated: September 9, 2004

/e/ Thomas E. Johnson

Thomas E. Johnson, #52000

Margaret H. Culp, # 180609

Counsel to Chapter 13 Trustee

310 Plymouth Building

12 South Sixth Street

Minneapolis, MN 55402

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**UNSWORN DECLARATION FOR PROOF OF SERVICE**

I, Deborah Miles, employed by Jasmine Z. Keller, Chapter 13 Trustee, declare that on September 9, 2004, I served Trustee's Response to Fee Application by Attorney for Debtor(s) on the individual(s) listed below, in the manner described:

**By electronic means:**

United States Trustee  
1015 United States Courthouse  
300 South 4<sup>th</sup> Street  
Minneapolis, MN 55415

**By first class U.S. mail, postage prepaid:**

Sally T McNamee  
13002 Jane Lane  
Minnetonka MN 55343

Mary L. Cox  
Henson & Efron P.A.  
220 South Sixth Street #1800  
Minneapolis MN 55402-4503

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

Executed: September 9, 2004

/e/ Deborah Miles