

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

IN RE:

BRADLEY G. PIEPER,

Debtor,

Karen Kellogg,

Plaintiff,

vs.

Bradley Pieper,

Defendant.

Adv. 04-4109

**ANSWER TO COMPLAINT TO
DETERMINE
DISCHARGEABILITY OF DEBT**

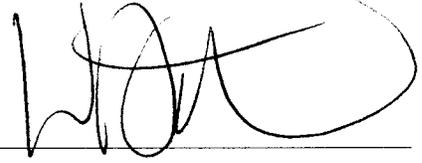
Defendant for his Answer to the Complaint to Determine Dischargeability of Debt states as follows:

- 1.) Defendant admits paragraph 1 thru 6, except that he denies he sent any defamatory statements to third parties.
- 2.) Defendant denies paragraphs 8, 9, and 10.
- 3.) Affirmatively alleges that due to a brain injury he was unable to attend the jury trial.
- 4.) Alleges that if a full hearing was conducted there would not be a finding of any willful and/or malicious conduct, and thus the debt should not be declared nondischargeable.
- 5.) Alleges that any statements made to third parties were truthful, and this not defamatory.

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WHEREFORE, Defendant prays that Plaintiff be awarded nothing and that Defendant be awarded his costs and disbursements.

COTTRELL LAW FIRM, P.A.



Dated: April 23, 2004

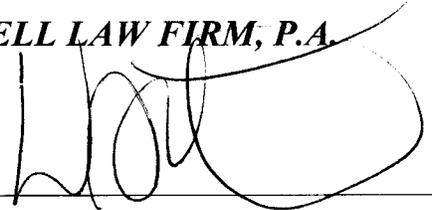
William G. Cottrell, *Attorney ID #146092*
3445 Washington Drive, Suite 204
Eagan, MN 55122-1340
(651) 905-0496

Attorney for Plaintiff

ACKNOWLEDGMENT

Counsel acknowledges that cost and disbursements, and reasonable attorney and witness fees, may be awarded pursuant to Minnesota's Statutes Section 549.211 to any party against whom allegations herein are asserted.

COTTRELL LAW FIRM, P.A.



Dated: April 23, 2004

William G. Cottrell, *Attorney ID #146092*
3445 Washington Drive, Suite 204
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WILLIAM G. COTTRELL*
ATTORNEY AT LAW

JOSEPH B. BACHMAN* **
OF COUNSEL

*QUALIFIED NEUTRAL UNDER RULE 114
** ALSO LICENSED IN WISCONSIN

CLAIRE A. CROSBY
PARALEGAL

ANNA J. OSTBY
LEGAL ASSISTANT

DAWN E. NOVOTNY
LEGAL SECRETARY

April 23, 2004

United States Bankruptcy Court
Attn: Civil Filing
301 U.S. Courthouse
300 South Forth Street
Minneapolis, MN 55415

Re: Karen Kellogg vs. Bradley Pieper
Court File No.: BKY 03-48625 NCD

04-4109

Dear Sir/Madam:

Please find enclosed for filing the *Answer to Complaint to Determine Dischargeability of Debt* regarding the above-entitled matter.

Thank you for your assistance in this matter.

Sincerely,



Claire A. Crosby
Paralegal

Enclosure

P.S. Please note that we need to obtain our password so that we may file on-line. Thank you.