

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In Re:

Bkty Case No.04-60437

Celina Aegidia Gill,

**AMENDED
MEMORANDUM IN SUPPORT OF
DEBTOR'S MOTION FOR POST-
CONFIRMATION MODIFICATION**

Debtor.

FACTS

This Chapter 13 bankruptcy case was filed on April 13, 2004 and confirmed on June 22, 2004. Subsequent to confirmation, Debtor added a creditor to her schedules. The creditor was Great River Federal Credit Union and the amount of the debt was approximately \$3,300.00. Debtor's spouse is a co-debtor on this debt and the debt to First National Bank of Cold Spring with an approximate balance of \$500.00.

ARGUMENT

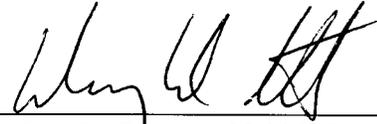
11 USC § 1329(a) permits a debtor to, on motion, at any time after confirmation of a plan and before all plan payments have been made to seek an increase or reduction in the amount of payments on claims of a particular class provided for by the plan, or to extend or reduce the time for such payments.

Debtor respectfully requests the Court's order modifying her plan to allow Great River Federal Credit Union and First National Bank of Cold Spring to be paid 100% of their claim in Paragraph 8 under the modified plan. Debtor's spouse is a co-debtor on each of these debts.

For these reasons, Celina Aegidia Gill respectfully requests the Court to confirm her modified plan, as submitted.

Dated this 20th day of August, 2004.

SCHMIDT AND LUND



Wesley W. Scott - #0264787
13 South Seventh Avenue
St. Cloud, MN 56301
(320-252-0330)

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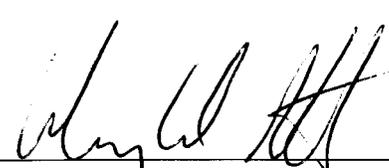
Celina Aegidia Gill,

Debtor.

NOTICE OF CONTINUED HEARING

Please be advised the motion hearing for confirmation of a post-confirmation modified plan previously scheduled for August 24, 2004 at 10:00 a.m. has been rescheduled to September 28, 2004 at 10:00 a.m. at the United States Bankruptcy Court, 205 U.S. P.O. Building, 118 South Mill Street, Fergus Falls, Minnesota.

Dated this 20th day of August, 2004.



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SERVICE LIST

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PO BOX 8116
S HACKENSACK NJ 07606-8116

BANK OF AMERICA
PO BOX 5270
CAROL STREAM IL 60197-5270

BEST BUY
RETAIL SERVICES
PO BOX 5238
CAROL STREAM IL 60197-5238

CAPITAL ONE
PO BOX 6000
SEATTLE WA 98190-6000

CUNA MUTUAL GROUP
PO BOX 3076
MILWAUKEE WI 53201-3076

DISCOVER
PO BOX 30952
SALT LAKE CITY UT 84130-0952

FIRST NATIONAL BANK OF COLD
SPRING
PO BOX 416
301 MAIN ST
COLD SPRING MN 56320

FIRST NORTH AMERICAN NATIONAL
BANK
PO BOX 78313
PHOENIX AZ 85062-9507

INTERNAL REVENUE SERVICE
STOP 5700
316 N ROBERT ST
ST PAUL MN 55101

JAMES GILL
11398 230TH ST
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JC PENNEY
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ORLANDO FL 32896-0001

RETAILERS NATIONAL BANK
PO BOX 59231
MINNEAPOLIS MN 55459-0231

SEARS
PO BOX 105486
ATLANTA GA 30348-5486

STATE BANK OF COLD SPRING
PO BOX 415
COLD SPRING MN 56320

TARGET
RETAILERS NATIONAL BANK
PO BOX 59317
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GREAT RIVER FEDERAL CREDIT
UNION
1532 WEST ST GERMAIN ST
PO BOX 1208
ST CLOUD MN 56302-1208

CUNA MUTUAL GROUP
CUNA MUTUAL MORTGAGE CORP
PO BOX 1332
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