

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

IN RE:

Bankruptcy No. 00-32486  
Chapter 7

Murray R. Klane

**AMENDED**  
**NOTICE OF HEARING**

Debtor.

TO: John R. Stoebner, 120 South Sixth Street, Suite 2500, Minneapolis, MN 55402, Attorney for Debtor Murray R. Klane; Charles Schneider, CPA, Ltd., 5200 West 73<sup>rd</sup> Street, Edina, MN 55439, Daniel W. Fram, Peterson, Fram & Bergman, 50 East Fifth Street, Suite 300, St. Paul, MN 55101, Attorney for Mark J. Glotter; Stanley W. Shapiro, M.D., 14614 Karyl Drive, Minnetonka, MN 55345-2919; Michael Iannacone, Iannacone Law Office, 8687 Eagle Point Boulevard, Lake Elmo, MN 55042; and the United States Trustee.

**PLEASE TAKE NOTICE** that the Court will hold a hearing on the objections of Mark J. Glotter and Stanley W. Shapiro, M.D. to the proposed sale of the estate's interest in Rights to Payment under the prior Sale of a Performance Fee from Desert Ventures Partners to SKM Acquisition Group for the sum of \$50,000 at 1:30 p.m. on Monday, September 13, 2004, before the Honorable Gregory F. Kishel in Courtroom 228B, 200 U.S. Courthouse, 316 North Robert Street, St. Paul, Minnesota.

The hearing may be continued by notice at the hearing without further written notice

If any party desires to make any offer to purchase the Rights to Payment under the prior Sale of a Performance Fee from Desert Ventures Partners to SKM Acquisition Group, notice must be served on the trustee by September 8, 2004, which is three days (3) days prior to the hearing date set forth above:

Timothy D. Moratzka,  
1400 AT&T Tower  
901 Marquette Avenue  
Minneapolis, MN 55402

The Trustees will accept higher offers in increments of \$5,000.00. All offers must be accompanied with certified funds for 10% of the total purchase price, payable to Timothy D. Moratzka, Trustee. The balance of the purchase price will be due at the time of order approving the sale becomes final, and shall be payable (in certified funds) to Timothy D. Moratzka, Trustee.

The Trustees will hold an auction at 10:00 a.m. on Thursday, September 9, 2004, at the offices of the Trustee at 1400 AT & T Tower, 901 Marquette Avenue, Minneapolis, Minnesota. The only parties allowed to bid will be those who give notice by September 8, 2004. Bids will close at the end of the auction.

DATED: August 16, 2004

MACKALL, CROUNSE & MOORE, PLC

By /s/Timothy D. Moratzka  
Timothy D. Moratzka (Attorney No. 75036)  
Attorneys for Trustee  
1400 AT&T Tower  
Minneapolis, MN 55402  
(612) 305-1400

U.S. BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

In re:

Murray R. Klane,  
Debtor(s)

UNSWORN DECLARATION  
FOR PROOF OF SERVICE

Bky. No. 00-32486-GFK

Cheryl DeBettignies, employed by Mackall, Crouse & Moore, attorney(s) licensed to practice law in this court, with office address of 1400 AT&T Tower, 901 Marquette Avenue, Minneapolis, MN 55402-2859, declares that on the date set forth below, I served the annexed **Amended Notice of Hearing on Objection to Notice of Sale of Performance Fee** upon the entity named below by faxing to him copies and by mailing to him copies thereof by enclosing same in an envelope with first class mail postage prepaid and depositing same in the post office at Minneapolis, Minnesota addressed to him as follows:

John R. Stoebner  
120 South Sixth Street, Suite 2500  
Minneapolis, MN 55402  
Attorney for Debtor Murray R. Klane

Daniel W. Fram  
Peterson, Fram & Bergman  
50 East Fifth Street, Suite 300  
St. Paul, MN 55101  
Attorney for Mark J. Glotter

Stanley W. Shapiro, M.D.  
14614 Karyl Drive  
Minnetonka, MN 55345-2919

Michael J. Iannacone  
Iannacone Law Office  
8687 Eagle Point Boulevard  
Lake Elmo, MN 55042

Charles E. Schneider, CPA, Ltd.  
5200 West 73<sup>rd</sup> Street  
Edina, MN 55439

United States Trustee  
1015 U.S. Courthouse  
300 South Fourth Street  
Minneapolis, MN 55415

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

Dated: August 16, 2004

Signed: /e/ Cheryl DeBettignies