

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

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In Re:

**RESPONSE TO MOTION  
TO DISMISS**

Richard L. Cochran,

Debtor(s).

BKY Case No. 02-31459

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TO: The United States Trustee, Jasmine Z. Keller, Chapter 13 Trustee and other parties in interest.

Richard L. Cochran, through his attorney, Joseph L. Kelly, responds to the motion of the Chapter 13 Trustee, which is scheduled for hearing at 10:30 a.m. on September 23, 2004 as follows:

Debtor will resume regular payments of \$103.00 in September, 2004, and pay an additional \$206.00 to the Chapter 13 Trustee on or before September 30, 2004, to cure the existing plan arrears.

WHEREFORE, Debtor requests the Court to deny the trustee's motion, approve the proposed payment schedule and for other relief that is just and equitable.

/e/ Joseph L. Kelly  
Joseph L. Kelly #273685  
12400 Portland Avenue South  
Suite 120  
Burnsville, MN 55337  
(952) 894-1144

Dated: September 14, 2004

## CERTIFICATE OF SERVICE

I, Joseph L. Kelly, hereby state that I caused a true and correct copy of the foregoing Response to Motion to Dismiss Chapter 13 Case of Richard L. Cochran, Debtor(s), be served by first class U.S. Mail, postage prepaid, this date upon the following:

United States Trustee  
300 South Fourth Street  
Minneapolis, MN 55415

Jasmine Z. Keller, Trustee  
310 Plymouth Building  
12 South Sixth Street  
Minneapolis, MN 55418

Dated: September 14, 2004

\EJoseph L. Kelly