
**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In Re:

Edward Lyle Gross and
Nellie Daune Roberts,

Debtors,

BANKRUPTCY CASE NO. 02-94367-GFK
CHAPTER 7

Michael S. Dietz, Trustee of the Bankruptcy
Estate of Edward L. Gross and Nellie Daune
Roberts,

Plaintiff,

vs.

ADVERSARY CASE NO. 03-3114

Edward L. Gross and Nellie Daune Roberts,

Defendants.

**DEFENDANTS' OBJECTIONS TO
PLAINTIFFS' EXHIBITS**

The Great-West Life Assurance Company,

Plaintiff,

vs.

ADVERSARY CASE NO. 03-3090

Edward L. Gross and Nellie Daune Roberts,

Defendants.

Defendants, Edward Lyle Gross and Nellie Daune Roberts, intend to and do object to the following exhibits intended to be offered by the Plaintiffs.

1. As to the Trustee:

- A. Exhibit 6: Personal Articles Application, dated October 10, 2001, for State Farm Insurance, including attached Basic Schedule Premiums Schedule for Jewelry.

Grounds for the objection include: Lack of foundation; Lack of relevance;
Hearsay not subject to any exception to the rule.

2. As to The Great-West Life Assurance Company:

- A. Exhibit 21: Personal Articles Application, dated October 10, 2001, for State Farm Insurance, including attached Basic Schedule Premiums Schedule for Jewelry.

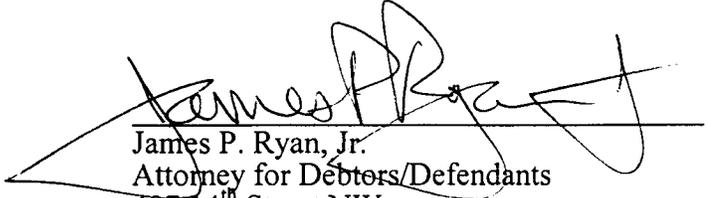
- B. Exhibit 35: Letter from Ryan to Dietz and Seidl, dated December 30, 2003.

Grounds for the objections are on the same grounds as asserted in opposition to Trustee's Exhibit 6.

Respectfully submitted,

Dated: 8/11/04

RYAN & GRINDE, LTD.



James P. Ryan, Jr.
Attorney for Debtors/Defendants
407 14th Street NW
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Rochester MN 55903-6667
(507) 8282-8118
Attorney Reg. No. 94924

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In Re:

Edward Lyle Gross and
Nellie Daune Roberts,

Debtors,

BANKRUPTCY CASE NO. 02-94367-GFK
CHAPTER 7

**UNSWORN DECLARATION
FOR PROOF OF SERVICE**

Michael S. Dietz, Trustee of the Bankruptcy
Estate of Edward L. Gross and Nellie Daune
Roberts,

Plaintiff,

vs.

ADVERSARY CASE NO. 03-3114

Edward L. Gross and Nellie Daune Roberts,
Defendants.

The Great-West Life Assurance Company,
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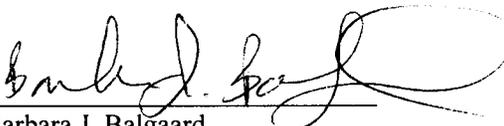
Edward L. Gross and Nellie Daune Roberts,
Defendants.

Barbara J. Balgaard, employed by Ryan & Grinde, LTD, attorney(s) licensed to practice law in this court, with an office address of 407 14th Street NW, PO Box 6667, Rochester, Minnesota 55903-6667, declares that on August 11, 2004, she served the annexed **DEFENDANTS' TRIAL BRIEF and DEFENDANTS' OBJECTIONS TO PLAINTIFFS' EXHIBITS** upon each of the entities named below by **facsimile** and by **mailing** to each of them a copy thereof by enclosing the same in an envelope with first class mail postage prepaid and depositing the same in the post office at Rochester, Minnesota, addressed to each at their respective addresses as follows:

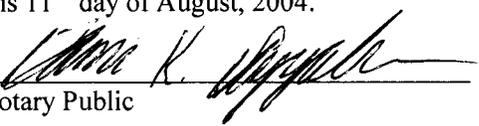
FACSIMILE: (612) 339-4181
MR. CHRISTOPHER A. SEIDL
ROBINS, KAPLAN, MILLER & CIRESI, L.L.P.
2800 LASALLE PLAZA
800 LASALLE AVENUE
MINNEAPOLIS, MN 55402-2015

FACSIMILE: (612) 664-5516
US TRUSTEE
1015 US COURTHOUSE
300 SOUTH 4TH STREET
MINNEAPOLIS MN 55415

Dated: August 11, 2004


Barbara J. Balgaard

Subscribed and sworn to before me
this 11th day of August, 2004.


Notary Public

