

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

Nellie Daune Roberts
Edward Lyle Gross,

Adv 03-3114

Bky 2-94367

Debtors.

Michael S Dietz Trustee for the Bky Est,

Plaintiff,

v.

ANSWER TO COMPLAINT

Edward Lyle Gross
Nellie Daune Roberts,

Defendants.

Edward Lyle Gross and Nellie Daune Roberts, debtors and defendants herein, for their answer to plaintiff's complaint, hereby admit, deny, and allege as follows:

ANSWER

1. Defendants admit the allegations of paragraphs 1, 2, 3, 4, 5, 6, and 10 of plaintiff's complaint.
2. Defendants deny the allegations of paragraphs 7, 9, 13, 14, 16 through 25, 26, 27, 28, and 30 through 44.
3. Defendants admit that a 1971 Jaguar XKE was sold.
4. Defendants admit that a 1953 Austin A40 sport auto was sold.

5. Defendants admit that certain withdrawals and bank transfers were made on or about the times alleged in paragraph 8 of plaintiff's complaint; but deny that they were made for any improper purpose as may be alleged and affirmatively allege that such were made for ordinary and necessary living expenses and/or payment on debts outstanding at those times and places.

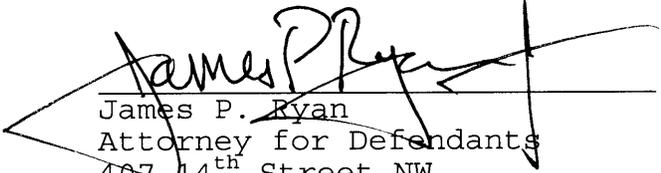
6. With respect to the allegations made by the Trustee in paragraph 26, the defendants assert that they estimated the value of household goods, furnishings and other items, the majority of which are or were not property of the bankruptcy estate, pursuant to the exemption statutes. The defendants deny the balance.

7. Defendants deny each and every matter of fact and thing alleged in the complaint not specifically admitted or otherwise qualified herein.

WHEREFORE, Defendants seek an order of the court dismissing the complaint herein and for such other and further relief as the court deems just and equitable.

Dated: May 14, 2003

RYAN & GRINDE, LTD.



James P. Ryan
Attorney for Defendants
407 14th Street NW
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Rochester, MN 55903-6667
(507) 282-8118
Attorney Reg. No. 94924

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In Re:

Edward Lyle Gross and
Nellie Daune Roberts,

**UNSWORN DECLARATION
FOR PROOF OF SERVICE**

Debtor(s)

Bky. Case No. 02-94367

Shannon Decker, employed by Ryan & Grinde, LTD, attorney(s) licensed to practice law in this court, with office address of 407 14th Street NW, Rochester, Minnesota, 55901, declares that on May 14, 2003, she personally served the annexed **Answer to Complaint** upon each of the entities named below by handing to and leaving with Valene Blufus a true and correct copy of said documents.

Michael S Dietz
Dunlap and Seeger PA
206 South Broadway
Suite 505
PO Box 549
Rochester MN 55903

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

Dated: May 14, 2003

Signed

Shannon Decker
Shannon Decker

JPR/smd