

UNITED STATE BANKRUPTCY COURT
DISTRICT OF MINNESOTA

IN RE:

James E Wilkes

Chapter 13 Proceeding
Bky. No. 03-34914 GFK

Debtor(s).

RESPONSE TO MOTION FOR
DISMISSAL OR CONVERSION

1. James E. Wilkes, Debtor(s), by and through his attorney, files this Response to the Motion for Dismissal or Conversion by Jasmine Z. Keller, Chapter 13 Trustee.

2. Debtor(s) has paid \$1,800.00 into the plan.

3. Debtor(s) request that he be allowed to cure the default by paying \$250.00 prior to the hearing, resume his regular monthly payments in October and by paying the estimated arrears of \$500.00 by November 1, 2004.

WHEREFORE, debtor(s) respectfully requests that the Court enter a Cure Order as stated herein.

Dated: Sept 9, 2004

/e/ James T. Skonnord
Attorney for Debtors
311 Ramsey Street
St. Paul, MN 55102
(651) 224-8992

VERIFICATION

I, James T. Skonnord, attorney for Debtor, declare under penalty of perjury, that the foregoing is true and correct to the best of my knowledge and belief.

Dated: Sept 9, 2004

/e/ James T. Skonnord
James T. Skonnord, 10193X
311 Ramsey Street
St. Paul, MN 55102

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

UNSWORN CERTIFICATE OF SERVICE

I, Cindy Collins, declare under penalty of perjury that on September 9, 2004, I served copies of the Response To Motion For Dismissal or Conversion and an Unsworn Certificate Of Service by first class mail, postage prepaid, to each entity listed below and addressed as follows:

Jasmine Z. Keller
Chapter 13 Trustee
310 Plymouth Building
Minneapolis, MN 55402

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

Thomas J. Reiter & Assoc.
Reiter & Schiller
6 Fifth Street Suite 700
St. Paul, MN 55102-1440

Dated: _____

9/9/4

Signed: _____

Cindy Collins

Cindy Collins