UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

MIKACEVICH, LORI J. **BKY 03-35297**

Chapter 13

Debtor(s).

ANSWER TO CHAPTER 13 TRUSTEE'S MOTION TO DISMISS

TO: Jasmine Keller, Chapter 13 Trustee; U.S. Trustee; and all other entities specified in Local Rule 9013-1.

1. The debtor admits all of the allegations contained in the trustee's motion.

2. The debtor has fallen behind on their Chapter 13 plan payments of $350.00 per month. The debtor has had in interruption in their regular income due to change of job and move to Rochester, MN and now feel that they will have no further problems meeting their monthly plan payments.

3. The debtor proposes the following to bring her plan current;

   $350.00 by October 27, 2004
   $700.00 by November 15, 2004
   November payment by November 30, 2004

WHEREFORE, debtor(s), submit this answer to the Trustee's Motion to Dismiss and request the Motion be denied.

Dated: October 25, 2004

PRESCOTT & PEARSON, P.A.

/s/ Richard J. Pearson

Jack L. Prescott (#88079)
Richard J. Pearson (#130308)
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Telephone (651) 633-2757

UNITED STATES BANKRUPTCY COURT
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In re:
MIKACEVICH, LORI J.

BKY No. 03-35297
Chapter 13

Debtor(s)

UNSWORN DECLARATION OF SERVICE

Lindy Voss, an employee at Prescott & Pearson, P.A., a law firm licensed to practice law in this court, with offices at 443 Eighth Avenue Northwest, New Brighton, Minnesota 55112, declares that on October 25, 2004, she served the annexed ANSWER TO CHAPTER 13 TRUSTEE'S MOTION TO DISMISS, upon each of the entities listed below or on the attached sheet by mailing to each of them a copy thereof by enclosing same in an envelope with first class postage prepaid and depositing same in the post office at New Brighton, Minnesota, addressed to each of them as listed.

US TRUSTEE OFFICE
1015 US COURTHOUSE
300 SO FOURTH ST
MINNEAPOLIS MN 55415

CHAPTER 13 TRUSTEE
310 PLYMOUTH BLDG
12 SO SIXTH ST
MINNEAPOLIS MN 55402

LORI J MIKACEVICH
3050 AVALON COVE CT NW
ROCHESTER MN 55901

And she declares under penalty of perjury that the foregoing is true and correct.

Dated: October 25, 2004

/s/ Lindy Voss

Lindy Voss