

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

William H. Laehn,
Debtor.

Case No.: BKY 03-38375

Bank One Delaware, NA
f.k.a. First U.S.A.,
Plaintiff,

vs.

Case No.: ADV 04-3097

William H. Laehn,
Defendant.

**UNSWORN DECLARATION FOR
PROOF OF SERVICE**

I, Judith M. Stoltman, employed by Robertson, Blahnik & Nelson Law Firm, attorneys licensed to practice law in the Court, with office address of 177 Main Street, Suite 206, Winona Minnesota 55987, declare under penalty of perjury that on April 6, 2004, I served the annexed **Answer to Complaint** to each person referenced below, 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 Winona Minnesota, addressed to each of them as follows:

David Hoiland
Attorney for Plaintiff
120 South Sixth Street #1100
Minneapolis MN 55402

Dated this 6th Day of April, 2004.

/e/ Judith M. Stoltman
177 Main Street, Suite 206
P.O. Box 167
Winona, MN 55987

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA
THIRD DIVISION

In re:

WILLIAM H. LAEHN,
Debtor.

Bank One Delaware, NA
f.k.a. First U.S.A.,
Plaintiff,

Case No. BKY #03-38375

vs.

Case No. ADV #04-3097

William H. Laehn,
Defendant.

ANSWER

Defendant Answers Plaintiff's Complaint as follows:

1. Except as hereinafter admitted or qualified, Defendant denies each and every allegation in Plaintiff's Complaint.

2. Defendant admits the allegations contained in paragraphs 1, 2, and 3 of Plaintiff's Complaint.

3. Defendant denies the allegations contained in paragraphs 4, 5, 6, 7, 8, and 9 of Plaintiff's Complaint and puts Plaintiff to its strict proof thereof.

WHEREFORE, Defendant demands Judgment:

1. Dismissing Plaintiff's Adversary Complaint.

2. Awarding Defendant his costs and disbursements and such other and further relief as the Court may deem just and equitable.

Dated: April 6, 2004

ROBERTSON, BLAHNIK & NELSON

By: /e/ Bruce A. Nelson
Bruce A. Nelson, #194827
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