

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA  
THIRD DIVISION

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IN RE:

BKY 04-30730 GFK

Robert E. Covey,

Chapter 13

Debtor.

TRUSTEE'S RESPONSE TO FEE  
APPLICATION BY ATTORNEY  
FOR DEBTOR

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TO: All parties in interest pursuant to Local Rule 9013-3:

1. Jasmine Z. Keller, the standing Chapter 13 Trustee (the "Trustee"), by her undersigned attorney, submits this response to the Notice of Hearing and Application for Compensation by Attorney for Debtor (the "Application").

2. The Court will hold a hearing on the Application on November 1, 2004, at 1:30 p.m., or as soon thereafter as counsel can be heard, in Courtroom 228B, U.S. Courthouse, 316 North Robert Street, St. Paul, Minnesota.

3. As of October 19, 2004, the Trustee has received \$2,900 from the above-named Debtor. The Debtor is current in his payments to the Trustee in the sum of \$2,900 through the month of October 2004.

4. The Trustee has funds on hand in the amount of \$2,900 as of October 19, 2004. The Trustee has funds available in the amount of \$2,900 as of October 19, 2004.

5. The compensation requested in the Application does not exceed the amount estimated in ¶ 3 of the Debtor's confirmed Chapter 13 plan. Counsel has supplied the Court with disclosure of amounts paid by the Debtor.

6. Applicant's hourly rate is reasonable for an attorney with his level of experience. The time spent on this case was reasonably necessary for the proper representation of the Debtor in this proceeding.

7. The Trustee's Counsel has reviewed the Application and the request for allowance of fees and expenses. The Trustee **does not oppose the Court's granting the relief requested.**

October 19, 2004

Respectfully submitted,

/e/ Margaret H. Culp

Thomas E. Johnson, #52000

Margaret H. Culp, # 180609

Counsel to Chapter 13 Trustee

310 Plymouth Building

12 South Sixth Street

Minneapolis, MN 55402

(612) 338-7591

### **VERIFICATION**

I, Margaret H. Culp, employed by Jasmine Z. Keller, Chapter 13 Trustee, declare under penalty of perjury that the factual matters attested to in the foregoing are true and correct, to the best of my knowledge, information and belief.

Dated: October 19, 2004

/e/ Margaret H. Culp

Thomas E. Johnson, #52000

Margaret H. Culp, # 180609

Counsel to Chapter 13 Trustee

310 Plymouth Building

12 South Sixth Street

Minneapolis, MN 55402

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**UNSWORN DECLARATION FOR PROOF OF SERVICE**

I, Margaret H. Culp, employed by Jasmine Z. Keller, Chapter 13 Trustee, declare that on October 19, 2004, I served Trustee's Response to Fee Application by Attorney for Debtor(s) on the individual(s) listed below, in the manner described:

**By electronic means:**

United States Trustee  
612-664-5516  
G. Martin Johnson, Esq.  
952-881-2172

**By first class U.S. mail, postage prepaid:**

G. Martin Johnson, Esq.  
G. Martin Johnson, Ltd.  
3800 West Old Shakopee Road  
Bloomington, MN 55431

Robert E. Covey  
1204 Poppyseed Drive  
New Brighton, MN 55112

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

Executed: October 19, 2004

/e/ Margaret H. Culp