

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

---

In Re:  
Susan K. Dawson,

Bankruptcy Case Number: 04-31285

Debtor(s).

Chapter 13 Case  
**RESPONSE TO THE MOTION  
FOR DISMISSAL**

---

TO: Movant and other entities specified in Local Rule 1204(b).

Susan K. Dawson, debtor, by her attorneys, Hogle, Chwialkowski, Greeman & Bergmanis, P.L.L.C., through Robert Hogle, respond to the Motion to Dismiss by the Trustee, which is scheduled to be heard on October 28, 2004, and allege as follows:

1. In cure of current defaults in payment to the Chapter 13 Plan, the debtor shall make the following payments to the Trustee:
  - a. The debtor shall resume regular monthly payments to the Trustee, beginning with the October 2004 Chapter 13 payment.
  - b. In addition, the debtor shall pay the Trustee the sum of \$140.00 each month, for the months of November 2004, through April 2005, by the date on which the regular monthly payment is due.

WHEREFORE, the debtor has acknowledged to her attorney that she is in a position to resume the Chapter 13 Plan payments as provided in this Response and request the Motion for Dismissal be continued so she may have an opportunity to cure the Chapter 13 arrears.

Dated: 10/26/04

Signed: /e/Susan K. Dawson  
(Debtor)

**VERIFICATION**

I, Robert Hoglund, the undersigned, attorney for the Debtor(s), under penalty of perjury, hereby swear I have read the foregoing and it is true and correct to the best of my knowledge, information, and belief.

Dated: 10/26/04

HOGLUND, CHWIALKOWSKI, GREEMAN & BERGMANIS, P.L.L.C.

Signed: /e/Robert J. Hoglund

Robert J. Hoglund #210997

Keith Chwialkowski #210134

Marie F. Martin #287040

Jeffrey J. Bursell #293362

Attorney(s) for Debtor(s)

1611 West County Road B, Suite 106

P.O. Box 130938

Roseville, Minnesota 55113

Telephone Number: (651) 628-9929

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

In re:

Bankruptcy Case Number: 04-31285

Susan K. Dawson,

**SIGNATURE DECLARATION**

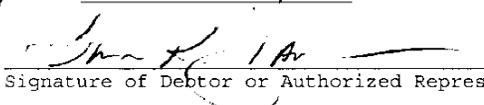
Debtor(s).

- ( ) PETITION, SCHEDULES & STATEMENTS  
( ) CHAPTER 13 PLAN  
( ) SCHEDULES AND STATEMENTS ACCOMPANYING VERIFIED CONVERSION  
( ) AMENDMENT TO PETITION, SCHEDULES AND STATEMENTS  
( ) MODIFIED CHAPTER 13 PLAN/MOTION FOR HEARING  
( X ) OTHER: (Please describe) Response to the Motion for Dismissal  
( X ) VERIFICATION: I(We), debtor(s) named in the attached response, declare under penalty of perjury that the foregoing is true and correct.

I [We], the undersigned debtor(s) or authorized representative of the debtor(s), **make the following declarations under penalty of perjury:**

- The information I have given my attorney and provided in the electronically filed petition, statements, schedules, amendments, and/or chapter 13 plan, as indicated above, is true and correct;
- The information provided in the "Debtor Information Pages" submitted as a part of the electronic commencement of the above-referenced case is true and correct;
- **[individual debtors only]** If no Social Security Number is included in the "Debtor Information Pages" submitted as a part of the electronic commencement of the above-referenced case, it is because I do not have a Social Security Number;
- I consent to my attorney electronically filing with the United States Bankruptcy Court my petition, statements and schedules, amendments, and/or chapter 13 plan, as indicated above, together with a scanned image of this signature Declaration and the completed "Debtor Information Pages," if applicable; and
- **[corporate and partnership debtors only]** I have been authorized to file this petition on behalf of the debtor.

Date: 11/26/04

  
Signature of Debtor or Authorized Representative

\_\_\_\_\_  
Signature of Joint Debtor

Susan K. Dawson  
Printed Name of Debtor or Authorized Representative

\_\_\_\_\_  
Printed Name of Joint Debtor

HOGLUND, CHWIALKOWSKI, GREEMAN & BERGMANIS, P.L.L.C.

Signed: /e/ Robert J. Hoglund  
Robert J. Hoglund #210997  
1611 West County Road B, Suite 106  
P.O. Box 130938  
Roseville, Minnesota 55113  
Telephone Number: (651) 628-9929