

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In Re: Decovich, Kirk and Sheila

BKY: 04-32262

Debtor(s)

Chapter 13 Case

DEBTOR(S) RESPONSE TO TRUSTEE'S MOTION TO DISMISS

1. The Chapter 13 Trustee has moved for the dismissal of the above referenced Chapter 13 Plan (the Plan).
2. Debtors fell behind on plan payments as Sheila's hours of employment were temporarily reduced. Debtors wish to complete the plan. Arrears under the Plan total \$1600, including the August, 2004 payment.
3. Debtor(s) propose to resume regular monthly payments beginning September, 2004. Debtor(s) also propose to cure the arrears to the Plan by making additional payment to the Trustee each month for six months in the amount of \$266.67 beginning October, 2004.

WHEREFORE, the Debtor(s) respectfully request(s) that the Court deny the Trustee's motion for dismissal.

Dated: September 14, 2004

By: Curtis K. Walker Law Firm

/e/ Curtis K. Walker
Curtis K. Walker #113906
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UNSWORN CERTIFICATE OF SERVICE

I, Rebecca Johnson, declare under penalty of perjury that on September 14, 2004, I mailed copies of the foregoing Debtor(s) Response to Trustee's Motion to Dismiss by first class mail, postage prepaid, to each entity named below at the address stated for each entity:

United States Trustee
1015 U.S. Courthouse
300 South 4th Street
Minneapolis, MN 55415

Jasmine Z. Keller
Trustee In Bankruptcy
310 Plymouth Building
Minneapolis, MN 55402

Executed on: September 14, 2004

/e/ Rebecca H. Johnson