

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In Re: Turner, Flontal & Brooke

BKY: 04-32764

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 because Brooke is temporarily unemployed. Arrears under the Plan total \$675, including the October 2004 payment.
3. Debtor(s) propose to resume regular monthly payments beginning November 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 \$112.50 beginning November, 2004.

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

Dated: October 22, 2004

By: Curtis K. Walker Law Firm

/e/ Curtis K. Walker
Curtis K. Walker #113906
Thayer A.K. Butler #200815
Mary C Hoben, #335411
4356 Nicollet Avenue South
Minneapolis, MN 55409
(612) 824-4357

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UNSWORN CERTIFICATE OF SERVICE

I, Rebecca Johnson, declare under penalty of perjury that on October 22, 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
12 South 6th Street
Minneapolis, MN 55402

Executed on: October 22, 2004

/e/ Rebecca H. Johnson