

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

BKY No. 04-34853

Raje Holdings, LLC,

Debtor.

**NOTICE OF HEARING AND
MOTION FOR APPROVAL OF
SALE OF PROPERTY FREE AND
CLEAR OF LIENS**

TO: All parties on the attached service list.

Patti J. Sullivan, the Trustee of the Bankruptcy Estate of Raje Holdings, LLC, ("Trustee"), moves the Court for approval of a sale of the Estate's interest in four motor vehicles free and clear of liens and gives notice thereof.

1. A hearing will be held on this Motion on November 4, 2004, at 2:30 P.M. in U.S. Courthouse, Courtroom 228A, 316 North Robert Street, St. Paul, MN before the Honorable Dennis D. O'Brien, U.S. Bankruptcy Judge. Any response to this motion must be filed and delivered not later than November 1, 2004 which is three days before the time set for the hearing (excluding Saturdays, Sundays and legal holidays), or filed and served by mail not later than October 26, 2004 which is seven days before the time set for the hearing (excluding Saturdays, Sundays and legal holidays). **UNLESS A RESPONSE OPPOSING THE MOTION IS TIMELY FILED, THE COURT MAY GRANT THE MOTION WITHOUT A HEARING.**

2. The Court has jurisdiction over this motion pursuant to 28 U.S.C. §§1334 and 157, Bankruptcy Rule 5005 and Local Rule 1070. This motion is a core proceeding under 28 U.S.C. §157(b)(2)(N). The petition commencing this Chapter 7 case was filed on August 18, 2004. This case is now pending before this Court.

3. This Motion arises under 11 U.S.C. §363, Bankruptcy Rule 6004(c) and Local Rule

9013-1. This Motion is filed under Bankruptcy Rule 9019 and Local Rule 9019-1.

4. The Trustee seeks this Court's Order authorizing the sale of the Estates's interest in the following motor vehicles:

a. 2001 Ford F-150 SuperCrew 4WD Pickup, VIN 1FTRW08L41KA90330.

The sale will be free and clear of the following claims, liens and interests, if any, of the First Financial Bank, Twin Valley, Minnesota. The Trustee believes that the security interest of First Financial Bank is void or voidable as it was recorded with the Minnesota Department of Public Safety, Drivers & Vehicles Services Division under "Paje Holdings, LLC." *See* Exhibit A.

b. 1999 Ford F-250 Extended Cab 4WD Pickup, VIN 1FTPX28L9XNA54009.

The sale will be free and clear of the following claims, liens and interests, if any, of the First Financial Bank, Twin Valley, Minnesota. The Trustee believes that the security interest of First Financial Bank is void or voidable as it was recorded with the Minnesota Department of Public Safety, Drivers & Vehicles Services Division under "Hoots Marine." *See* Exhibit B.

c. 1992 Ford Pickup, VIN 1FTEF14N0NPA06430.

The vehicle was registered with the Minnesota Department of Public Safety, Drivers & Vehicles Services Division under "Hoots Marine" and there are no liens against the vehicle. The sale will be free and clear of any claims, liens and interests. *See* Exhibit C.

d. 1999 Ford F250 Extended Cab Pickup, VIN 1FTPX2BLXXKB32481.

The sale will be free and clear of the claims, liens and interests, if any, of the First Financial Bank, Twin Valley, Minnesota. The Trustee believes that the security interest of First Financial Bank is void or voidable as, on information and belief, it was never recorded with

the Minnesota Department of Public Safety, Drivers & Vehicles Services Division. *See* Exhibit D.

5. The Trustee believes that it is in the best interest of the Bankruptcy Estate to sell the Trustee's interest in the Motor Vehicles free and clear of the above liens.

6. The Trustee seeks authorization to sell the Motor Vehicles free and clear of all the interests, liens, and claims of the First Financial Bank, Twin Valley, with those interests, liens, and claims, if any, to attach to the sale proceeds in the same priority and dignity as they held at the date of commencement of this bankruptcy proceeding.

WHEREFORE, pursuant to Bankruptcy Rules 6004 and 9019, the Trustee seeks an order approving the Trustee's sale of the Motor Vehicles free and clear of liens and for such other relief as is just and equitable.

FULLER, SEAVER & RAMETTE, P.A.

Dated: October 14, 2004

By: /e/ Andrea M. Hauser

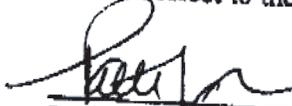
Randall L. Seaver 152882
Andrea M. Hauser 207469
12400 Portland Avenue South, Suite 132
Burnsville, MN 55437
(612) 890-0888

Attorneys for Patti J. Sullivan, Trustee

VERIFICATION

I, Patti J. Sullivan, the Chapter 7 Trustee for the Bankruptcy Estate of Raje Holdings, LLC, state under penalty of perjury that the foregoing factual background of the Notice of Hearing and Motion to Sell Property Free and Clear of Liens is true and correct to the best of my knowledge, information, and belief.

Dated: 10/14/, 2004


Patti J. Sullivan, Trustee

STATE OF MINNESOTA CERTIFICATE OF TITLE FOR A MOTOR VEHICLE

VEHICLE IDENTIFICATION NUMBER 1FTRW08L41KA90330	YEAR 01	MAKE FORD	MODEL/BODY CW COF	TITLE NUMBER D1920R621
DATE ISSUED 07/11/03	ODOMETER 85666	TAX BASE 029975	CODE 10	PLATE NUMBER KT0651
FIRST SECURED PARTY 06/16/03		OWNER PAJE HOLDINGS LLC		
1ST FINANCIAL BK PO BOX 247 TWIN VALLEY MN 56584		HWY 108 W OTTERTAIL MN 56571		
TOTAL LIENS 1		EXP 03		

ASSIGNMENT OF OWNERSHIP - BUYER(S) MUST COMPLETE THE APPLICATION ON THE BACK

ODOMETER DISCLOSURE STATEMENT. I (WE) CERTIFY THAT THE ODOMETER
 IS CORRECT (NO TENTHS) MILES AND TO THE BEST OF MY KNOWLEDGE THE ODOMETER MILEAGE IS:
 ACTUAL MILEAGE
 EXCEEDS MECHANICAL LIMITS OF ODOMETER
 NOT ACTUAL MILEAGE - WARNING ODOMETER DISCREPANCY

DAMAGE DISCLOSURE STATEMENT. TO THE BEST OF MY KNOWLEDGE THE VEHICLE
 HAS HAS NOT (CHECK ONE) SUSTAINED DAMAGE IN EXCESS OF 70% ACTUAL CASH VALUE
POLLUTION SYSTEM DISCLOSURE STATEMENT. TO THE BEST OF MY KNOWLEDGE THE POLLUTION CONTROL SYSTEM ON THIS VEHICLE INCLUDING THE RESTRICTED GASOLINE PIPE
 HAS HAS NOT (CHECK ONE) BEEN REMOVED, ALTERED OR RENDERED INOPERATIVE
 Assignment: I (we) certify that this vehicle is free from all security interests, unpaid sales tax, registration tax and vehicle tax.

SELLER'S PRINTED NAME(S) _____ DATE OF SALE _____ BUYER'S PRINTED NAME(S) _____
 SELLER'S ADDRESS _____ DEALER LICENSE # _____ BUYER'S ADDRESS _____
 SELLER'S SIGNATURE(S) _____ BUYER'S SIGNATURE(S) _____

IMPORTANT - PLEASE READ: All information collected on a motor vehicle application is required by law and is used to identify your motor vehicle. Failure to provide required information may result in denial of the requested action. Except for certain uses permitted by federal and state laws, personal information contained in your application may not be disclosed to anyone without your express consent. You may expressly consent to the disclosure of your information by writing to the following address:

MINNESOTA DEPARTMENT OF PUBLIC SAFETY
 DRIVER AND VEHICLE SERVICES DIVISION
 445 MINNESOTA STREET, ST. PAUL, MINNESOTA 55101
 PHONE 651-297-2126 TTY 651-282-6555
mndrvinfo.org

PS2700-12

KEEP IN A SAFE PLACE - ANY ALTERATION OR ERASURE VOIDS THIS TITLE

SELLER'S NOTICE OF SALE

When you sell this vehicle, you are responsible to file the information below with the Department of Public Safety within 10 days. Please file this information over the Internet at mndrvinfo.org or complete all information on this post card and submit by mail. This notice is not required if sold to a licensed dealer. M.S. 168A.10

01920R621 **1FTRW08L41KA90330**
 Title Number Vehicle Identification Number

Date of Sale _____

Purchaser's Driver License Number _____

Purchaser's Full Name _____ Purchaser's Date of Birth _____

Street Address _____

City _____ County _____ State _____ Zip Code _____

MINNESOTA MOTOR VEHICLE REGISTRATION CARD

YR **01** MK **FORD** MDL **CW COF**

VIN **1FTRW08L41KA90330**

GROSS VEHICLE WEIGHT/BASE VALUE **029975**

PLATE # **KT0651** EXP **03/31/04**

STICKER # **D0S33472** TAX **99.00**

RECORDED OWNER(S):
PAJE HOLDINGS LLC

**HWY 108 W
OTTERTAIL MN 56571**

PLEASE PRINT

EXHIBIT A

STATE OF MINNESOTA CERTIFICATE OF TITLE FOR A MOTOR VEHICLE

VEHICLE IDENTIFICATION NUMBER 1FTPX28L9XNA54009	YEAR 99	MAKE FORD	MODEL/BODY 4C COF	TITLE NUMBER H2690P118
DATE ISSUED 09/26/02	ODOMETER 113264	TAX BASE 023470	CODE 10	PLATE NUMBER BWY546
				CENTRAL OFFICE USE ONLY

EXP 12

FIRST SECURED PARTY
08/10/02

DOB

OWNER

HOOTS MARINE

FIRST FINANCIAL BANK

MAIN ST
TWIN VALLEY MN 56584

BOX 160
OTTERTAIL MN 56571-0160

TOTAL LIENS 1

Z

ASSIGNMENT OF OWNERSHIP

ODOMETER DISCLOSURE STATEMENT. I (WE) CERTIFY THAT THE ODOMETER NOW READS _____ (NO TENTHS) MILES AND TO THE BEST OF MY KNOWLEDGE THE ODOMETER MILEAGE IS:

ACTUAL MILEAGE
 EXCEEDS MECHANICAL LIMITS OF ODOMETER
 NOT ACTUAL MILEAGE — WARNING ODOMETER DISCREPANCY

DAMAGE DISCLOSURE STATEMENT. TO THE BEST OF MY KNOWLEDGE THIS VEHICLE HAS HAS NOT (CHECK ONE) SUSTAINED DAMAGE IN EXCESS OF 70% ACTUAL CASH VALUE.

POLLUTION SYSTEM DISCLOSURE STATEMENT. TO THE BEST OF MY KNOWLEDGE THE POLLUTION CONTROL SYSTEM ON THIS VEHICLE INCLUDING THE RESTRICTED GASOLINE PIPE HAS HAS NOT (CHECK ONE) BEEN REMOVED, ALTERED OR RENDERED INOPERATIVE.

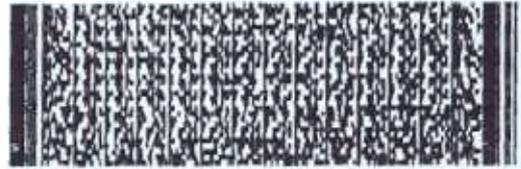
Assignment: I (we) certify that this vehicle is free from all security interests, warrant liens, and assign the registration tax and vehicle to:

SELLER'S PRINTED NAME(S)	DATE OF SALE / /	BUYER'S PRINTED NAME(S)
SELLER'S ADDRESS	DEALER LICENSE #	BUYER'S ADDRESS
X SELLER'S SIGNATURE(S)	X	BUYER'S SIGNATURE(S)

IMPORTANT — PLEASE READ: All information collected on a motor vehicle application is required by law and is used to identify your motor vehicle. Failure to provide required information may result in denial of the requested action. Except for certain uses permitted by federal and state laws, personal information contained in your application may not be disclosed to anyone without your express consent. You may expressly consent to the disclosure of your information by writing to the following address:

MINNESOTA DEPARTMENT OF PUBLIC SAFETY
 DRIVER AND VEHICLE SERVICES DIVISION
 445 MINNESOTA STREET, ST. PAUL, MINNESOTA 55101
 PHONE 651-297-2126 TTY 651-282-6655
www.dps.state.mn.us/dvs

PS2700-11



KEEP IN A SAFE PLACE - ANY ALTERATION OR ERASURE VOIDS THIS TITLE

SELLER'S NOTICE OF SALE

When you sell this vehicle, you are responsible to file the information below with the Department of Public Safety within 10 days. You may file over the Internet at www.dps.state.mn.us/dvs or complete this post card and mail. This notice is not required if sold to a licensed dealer. MN Statute 168A.10



2690P118

1FTPX28L9XNA54009

Title Number

Vehicle Identification Number

Date of Sale

Seller's Driver License Number (if any)

Seller's Full Name

Purchaser's Date of Birth

Seller's Address

County

State

Zip Code

PLEASE PRINT

MINNESOTA MOTOR VEHICLE REGISTRATION CARD

YR 99 MK FORD MDL 4C COF

VIN 1FTPX28L9XNA54009

GROSS VEHICLE WEIGHT/BASE VALUE 023470

PLATE # BWY546

EXP 12/31/02

STICKER # B2715437

TAX 99.00

RECORDED OWNER(S):

HOOTS MARINE

BOX 160
OTTERTAIL MN 56571-0160

EXHIBIT B



Driver & Vehicle Services Division
Department of Public Safety

Executed on 09-08-04 at St. Paul, Minnesota.

The undersigned, on behalf of the Director of the Driver and Vehicle Services Division, hereby certifies that the above is a true and correct copy of the record as shown in the files of the Department of Public Safety.

Records Supervisor, Public Counter
Driver and Vehicle Services

By

VH20 MOTOR VEHICLE RECORD DISPLAY 09/08/04
TYPE: P KEY: CDS480 HELP 08:17:03
FILE1: FILE2: FLAG: PROC AID:
PLATE: CDS480 STKR: 418288 EXP: 09 04 TAX: 35.00 PREV PLT: 429GEM SUSP N OPER 086
VIN: 1FTEF14NONPA06430 YR 1992 MK: FORD STYLE: PK SERIES: COF BASE: 015879
COLOR: BLU BLU EMPTY WT: AXLES: MC ENG: PR OWN: 2
CLASS: 10 FUEL: N LAST TRANS: R DATE: 10 15 03 NEW: BATCH: BW10700135
TITLE: G1920N476 PRINT: Y TRF DATE: 04 30 01 ODOMETER: NR LIENS: 0
OWNER HOOTS MARINE DOB 00 00 0000 ID H836444000000

ADDR: MAIN ST OTTERTAIL 56 56571
1ST SECURED PARTY:
ADDR:
DATE OF LIEN: INSP INDC: N REFUND SENT: RE ISSUE PLATE YEAR: 05

LESSEE1: PR-TX/DATE
LESSEE2: 35 112002
LESSEE3: 35
ADDR:

dba Hood's Marine

MINNESOTA DEPARTMENT OF PUBLIC SAFETY
Driver and Vehicle Services Division
ST. PAUL, MINNESOTA 55155
NOTIFICATION OF ASSIGNMENT, RELEASE OR GRANT OF SECURED INTEREST

YEAR 1999	MAKE FORD	TYPE	MODEL F250	VEHICLE IDENTIFICATION NO. 1FTPX2BLXXKB32481	TITLE NO.
OWNER(S) NAME(S) RAJE HOLDINGS LLC			SECURED PARTY'S NAME FIRST FINANCIAL BANK		
STREET ADDRESS 3492 WESTRIDGE DRIVE			STREET ADDRESS 205 MAIN AVE W. PO BOX 247		MINNESOTA TAX ID. NO. 9008138
CITY SHAKOPEE	STATE MINNESOTA	ZIP CODE 55379	CITY TWIN VALLEY		STATE MINNESOTA
SIGNATURE OF OWNER(S), NECESSARY ONLY WITH GRANT 			SIGNATURE AND TITLE OF AUTHORIZED AGENT <i>Alison D. Reed, EVT</i>		

- ASSIGNMENT The secured party named in Section A has assigned his interest to the secured party named in Section B.
 - RELEASE The secured party named in Section A no longer claims a security interest in the vehicle described above. Date of Release _____
 - GRANT The owner(s) have granted to the secured party named in Section A a security interest in the vehicle described above.
- Date of Security Agreement 04-05-2004

- NOTICE -
This form must be notarized to release a lien.

Subscribed and sworn to before me this _____ day of _____

B	ASSIGNEE'S NAME, NECESSARY ONLY WITH ASSIGNMENT		
	STREET ADDRESS		MINNESOTA TAX ID. NO.
	CITY	STATE	ZIP CODE

NOTARY PUBLIC

COUNTY

MY COMMISSION EXPIRES

Lien card is pending with the State of MN.

EXHIBIT, D COPY

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MINNESOTA**

In re:

Raje Holdings, LLC,

BKY No. 04-34853

Debtor.

UNSWORN CERTIFICATE OF SERVICE

I, Andrea M. Hauser, declare under penalty of perjury that on October 14, 2004, I caused to be served the following:

1. Notice of Hearing and Motion for Approval of Sale of Property Free and Clear of Liens; and
2. Proposed Order Approving Sale of Property Free and Clear of Liens

upon the following persons and entities:

Kenneth Corey-Edstrom
Larkin, Hoffman, Daly & Lindgren, Ltd.
1500 Wells Fargo Plaza
7900 Xerxes Avenue South
Bloomington MN 55431-1194

Office of the U.S. Trustee
1015 U. S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415

First Financial Bank
205 Main Avenue West
P.O. Box 247
Twin Valley, MN 56584-0247

FULLER, SEAVER & RAMETTE, P.A.

Executed on October 14, 2004

By: _____
Andrea M. Hauser 207469
12400 Portland Avenue South, Suite 132
Burnsville, MN 55337
(952) 890-0888

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

BKY No. 04-34853

Raje Holdings, LLC,

Debtor.

**ORDER APPROVING
SALE OF PROPERTY
FREE AND CLEAR OF LIENS**

This matter came before the Court on November 4, 2004 upon the Motion of Patti J. Sullivan, Trustee, for Approval of Sale of Property Free and Clear of Liens under 11 U.S.C. §363. Appearances of counsel were noted in the record. Based upon the Motion, arguments of counsel, files and records of the proceedings herein, IT IS HEREBY ORDERED:

1. The Trustee may sell the Estate's interest in the following motor vehicles free and clear of the following claims, liens and interests, if any, of the First Financial Bank, Twin Valley, Minnesota:
 - a. 2001 Ford F-150 SuperCrew 4WD Pickup, VIN 1FTRW08L41KA90330;
 - b. 1999 Ford F-250 Extended Cab 4WD Pickup, VIN 1FTPX28L9XNA54009;
 - c. 1992 Ford Pickup, VIN 1FTEF14N0NPA06430; and
 - d. 1999 Ford F250 Extended Cab Pickup, VIN 1FTPX2BLXXKB32481.
2. The sale of the Motor Vehicles shall be free and clear of claimed liens, claims, and interests of the First Financial Bank, Twin Valley, Minnesota, with such claims, liens, and interests, if any, to attach to the proceeds from the sale of the Motor Vehicles in the same priority and dignity as those claims, liens, and interests held as of the date of the commencement of this case.
3. The Trustee is authorized to execute such documents and to pay such normal costs as are necessary to effectuate the sale of the Motor Vehicles.

BY THE COURT:

Dated: _____, 2004

Dennis D. O'Brien
United States Bankruptcy Judge

