

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

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In re:

BKY No. 02-50651  
ADV No. 04-5028

Jerry Raymond Reno, Sr.,

Debtor.

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Randall L. Seaver, Trustee,

Plaintiff,

vs.

ANSWER

Karen Goerts,

Defendant.

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TO: Plaintiff, c/o his attorneys, Roger B. Seaver and Randall L. Seaver

Defendant, Karen Goerts, through her attorney, Robert R. Kanuit, responds to Plaintiff's Complaint as follows:

1. Defendant denies each and every allegation contained in Plaintiff's Complaint except as qualified or admitted below.
2. Defendant admits paragraphs 1, 2, 3, 4, 5 and 9 of Plaintiff's Complaint.
3. Defendant denies paragraphs 8, 11 and 12 of Plaintiff's Complaint.
4. Defendant states that she is without knowledge or information sufficient to form a belief as to the truth of paragraphs 6, 7, 10 and 13 of Plaintiff's Complaint, and therefore denies same.

WHEREFORE, Defendant respectfully requests that the Court:

1. Dismiss Plaintiff's Complaint with prejudice.
2. Award Defendant her costs and disbursements in this action.

3. Grant Defendant such other and further relief as is just and equitable.

Dated: August 11, 2004

/e/ Robert R. Kanuit  
Robert R. Kanuit, License No. 0252530  
Kanuit & Bray, Ltd.  
Attorney for Defendant  
4815 West Arrowhead Road, Suite 230  
Hermantown, MN 55811  
(218) 722-7722

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**UNSWORN DECLARATION FOR PROOF OF SERVICE**

The undersigned, being an employee of Kanuit & Bray, Ltd., attorneys licensed to practice law in this Court, with office address of 4815 W. Arrowhead Road, #230, Hermantown, MN 55811, declares under penalty of perjury that on the date stated below, she served the annexed Answer upon the parties named below by mailing to them a copy thereof by enclosing same in an envelope with first class mail postage prepaid and depositing same in the post office at Hermantown, Minnesota, addressed to each of them as follows:

Mr. Roger B. Seaver  
Mr. Randall L. Seaver  
12400 Portland Avenue South  
Suite 132  
Burnsville, MN 55337

Dated this 11th day of August, 2004.

/e/ Bonnie K. Vanderpool  
Bonnie K. Vanderpool