

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

BKY No. 02-50651
ADV No. 04-5029

Jerry Raymond Reno, Sr.,

Debtor.

Randall L. Seaver, Trustee,

Plaintiff,

vs.

ANSWER

Raymond Reno and Harriet Reno,

Defendants.

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

Defendants, Raymond Reno and Harriet Reno, through their attorney, Robert R. Kanuit, respond to Plaintiff's Complaint as follows:

1. Defendants deny each and every allegation contained in Plaintiff's Complaint except as qualified or admitted below.
2. Defendants admit paragraphs 1, 2, 3 and 4 of Plaintiff's Complaint.
3. Defendants deny paragraphs 5, 6, 7, 8 and 9 of Plaintiff's Complaint.
4. Defendants state that they are without knowledge or information sufficient to form a belief as to the truth of paragraph 10 of Plaintiff's Complaint, and therefore deny same.

WHEREFORE, Defendants respectfully request that the Court:

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

3. Grant Defendants 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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Defendants.

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