

United States Bankruptcy Court
District of Minnesota

In Re:

Case No. 04-50707
Chapter 7

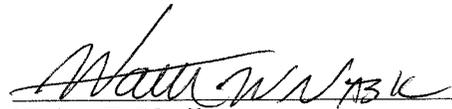
Devin K. and Beth A. Hoag,
Debtors.

RESPONSE TO MOTION

Now come Devin K. and Beth A. Hoag, Debtors in this matter and in Response to the Interim Trustee's Motion on Property Claimed Exempt, state as follows:

1. The Interim Trustee in this matter has acknowledged that available exemption to protect the real estate is \$20,450.
2. The property's fair market value is \$17,500.
3. Debtors have available (d)(5) exemption to protect both the real estate and the nominal bank account.

9/1/04



Walter W Vasil
Attorney for Debtors
Attorney ID No. 112525
200 Board of Trade Building
301 West First Street
Duluth, MN 55802
(218) 722-3988

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AFFIDAVIT

Now come Debtors and for their Affidavit in Response to the Interim Trustee's Motion, state as follows:

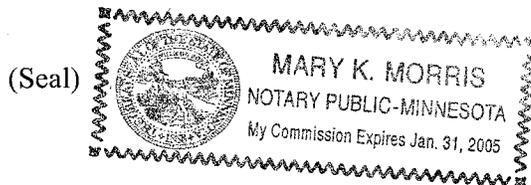
1. We purchased the property in question for \$19,000. We got a bad deal. We were moving up to Duluth and really were not familiar with the property values in the area. Because of the condition of the property, as explained to the Interim Trustee at the 1st Meeting of Creditors, we do believe the property is worth \$17,500.
2. Attached hereto is a printout from the St. Louis County Auditor showing that for year 2004 the total estimated market value for the property is indeed \$17,500.
3. The day we filed bankruptcy we had \$16 in our account. The day after we filed bankruptcy was payday and our checking account naturally went up after payday.

Devin K. Hoag
Devin K. Hoag

Beth A. Hoag
Beth A. Hoag

Subscribed and sworn to before me
this 8 day of September, 2004.

Mary K Morris
Notary Public



ISPTAXR1 Eff date: 1/02/04 Display Tax Records

11:07:56

Parcel number/Tax year: 535-0010-01270 2004

8/11/04

Property class(es) : SEASONAL

Name: HOUG DEVIN K & BETH A

Total est market value: 17,500
New improvements . . . : 0

Local tax rate . . . : 103.975%
Market tax rate . . . : .03773%
Judgment year . . . :

Taxable est land value: 12,400
Taxable building value: 700
Total taxable value . . : 13,100
Tax before aid/credits: 164.36
State paid aids . . . : .00
Res/Ag credits : .00
Taconite/suppl hstd cr: .00
Powerline&disaster cr : .00

Confession years . . :
Dlq taxes/Bankrupt . : No No
Non school market tax : .00
Tax before spec asmt : 164.36
Special assessments : 19.72
Other special taxes . : .00
Total tax and special : 184.08
Less payments to date: .00

Tax after aid/credits : 164.36
County : 111.26
City or town . . . : 19.72
School tax : 3.62
Special taxing dists: 1.62
Fiscal disparity tax : .00

Balance tax and spec : 184.08
Penalty due : 5.52
Cost due & fees . . . : .00
Interest due : .00
Total amount due . . : 189.60
Bal 1st half tax & pen: 97.56

Press Enter to continue or enter new parcel/tax year. 535-0010-01270 2004

F1=More F2=Adj F3=Exit F5=Tree F6=Mth F7=Back F9=TNT F10=Reprint F12=Cancel

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AFFIDAVIT OF MAILING

STATE OF MINNESOTA

SS

COUNTY OF ST. LOUIS

Michelle Bottila, being first duly sworn, says that hereinafter listed are the names and addresses of the persons to whom she faxed and mailed by First Class Mail, postage prepaid at Duluth, Minnesota, on the 13th day of September, 2004, a copy of **Response to Motion and Affidavit**:

John Hedback, Trustee
2855 Anthony Lane S, Ste 201
St. Andrews, MN 55418
Fax: (612) 789-2109


Michelle Bottila

Subscribed and sworn to before me this
13 day of Sept, 2004.


Notary Public

