

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In Re: Ross H. Honsey,

Bky. No.: 01-33988

Debtor

Adv. No.: 02-9179

Randall L. Seaver,

Plaintiff,

vs.

ANSWER

Ross H. Honsey,

Defendant.

Ross H. Honsey, Defendant, for purposes of his Answer to Plaintiff's Complaint, states and alleges as follows:

1. Denies each and every allegation and thing contained therein except as admitted to or otherwise qualified herein.
2. Admits the statements and allegations stated in Paragraphs 1, 2, 3, 4, 6, 7, 8, 9, 13, and 15 of Plaintiff's Complaint.
3. Specifically denies the statements and allegations contained in Paragraphs 10, 11, 17, and 18 of Plaintiff's Complaint.
4. States that Defendant is without sufficient information to admit or deny the statements and allegations contained in Paragraphs 5, 12, 14 and 16 of Plaintiff's Complaint.
5. States that Defendant and Diane L. Honsey are husband and wife and were husband and wife on March 9, 2001.
6. Alleges that the transfers of real property between Defendant and Debtor, which occurred

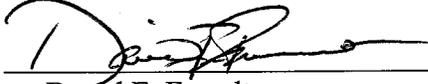
on March 9, 2001, were made in good faith for estate planning purposes only and that said transfers were not done with the intent to rid Defendant of his ownership interest in real property which exceeded the homestead exemption limitations under the laws of the State of Minnesota.

WHEREFORE, Defendant respectfully requests that this Court enter an Order:

1. Denying Plaintiff's request for the revocation of the Discharge of Defendant.
2. Denying Plaintiff's request for his costs and disbursements incurred with bringing this action.
3. Awarding Defendant his costs and disbursements incurred as a result of this action.
4. For such other and further relief as the Court deems just and equitable.

Dated: 1/15/03

FRUNDT & JOHNSON, LTD.

By: 

David F. Frundt

Attorney for Defendant

117 West 5th Street

P.O. Box 95

Blue Earth, MN 56013

(507) 526-2177

Attorney ID # 028550X

**UNITED STATES BANKRUPTCY COURT
District of Minnesota**

In re: Ross H. Honsey

Debtor

**Bky No. 01-33988
Adv. No. 02-9179**

Randall L. Seaver,

Plaintiff,

vs.

Ross H. Honsey,

Defendant

Certificate of Service

The undersigned hereby certifies that a true copy of the Answer was mailed to all parties interest at the addresses set forth in the exhibit which is attached hereto by first class mail on January 15, 2003.

Subscribed and sworn to before me this
____ day of _____, 2003.

Notary Public

David F. Frundt, 028550X
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P. O. Box 95
Blue Earth, MN 56013
Tel. No. (507)893-3215

U. S. Trustee
1015 U. S. Courthouse
300 South 4th St.
Minneapolis, MN 55415

Randall L. Seaver
Bankruptcy Trustee
12400 Portland Ave. S.
Ste. 132
Burnsville, MN 55337