

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA
THIRD DIVISION

IN RE:

BKY 02-90004 DDO

Darren R. Grangruth,

Chapter 13

Debtor.

TRUSTEE'S RESPONSE TO FEE
APPLICATION BY ATTORNEY
FOR DEBTOR

TO: All parties in interest pursuant to Local Rule 9013-3:

1. Jasmine Z. Keller, the standing Chapter 13 Trustee (the "Trustee"), by her undersigned attorney, submits this response to the Notice of Hearing and Application for Compensation by Attorney for Debtor (the "Application").

2. The Court will hold a hearing on the Application on September 1, 2004, at 2:30 p.m., or as soon thereafter as counsel can be heard, in Courtroom 228A, U.S. Courthouse, 316 North Robert Street, St. Paul, Minnesota.

3. As of August 18, 2004, the Trustee has received \$10,850 from the above-named Debtor. The Debtor is current in his payments to the Trustee in the sum of \$350 through the month of July 2004.

4. The Trustee has funds on hand in the amount of \$350 as of August 18, 2004.

5. The compensation requested in the Application appears to have been the result of legal services necessary to assist the Debtor in removing a lien that impaired an exemption to which the Debtor is entitled.

6. Applicant's hourly rate is reasonable for an attorney with his level of experience. The time spent on the legal proceedings was reasonably necessary for the proper representation of the Debtor.

7. The Trustee's Counsel has reviewed the Application and the request for allowance of fees and expenses. The Trustee **does not oppose the Court's granting the relief requested.**

Dated: August 18, 2004

Respectfully submitted,

/e/ Margaret H. Culp
Thomas E. Johnson, #52000
Margaret H. Culp, # 180609
Counsel to Chapter 13 Trustee
310 Plymouth Building
12 South Sixth Street
Minneapolis, MN 55402
(612) 338-7591

VERIFICATION

I, Margaret H. Culp, employed by Jasmine Z. Keller, Chapter 13 Trustee, declare under penalty of perjury that the factual matters attested to in the foregoing are true and correct, to the best of my knowledge, information and belief.

Dated: August 18, 2004

/e/ Margaret H. Culp
Thomas E. Johnson, #52000
Margaret H. Culp, # 180609
Counsel to Chapter 13 Trustee
310 Plymouth Building
12 South Sixth Street
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UNSWORN DECLARATION FOR PROOF OF SERVICE

I, Margaret H. Culp, employed by Jasmine Z. Keller, Chapter 13 Trustee, declare that on August 18, 2004, I served Trustee's Response to Fee Application by Attorney for Debtor on the individual(s) listed below, in the manner described:

By electronic means:

United States Trustee
612-664-5516

Richard M. Schreiber, Esq.
651-554-0122

By first class U.S. mail, postage prepaid:

Richard M. Schreiber, Esq.
P.O. Box 2273
Inver Grove Heights, MN 55076

Darren R. Grangruth
701 Third Street SW
Waseca, MN 56093

And I declare, under penalty of perjury, that the foregoing is true and correct.

Executed: August 18, 2004

/e/ Margaret H. Culp