

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF IOWA**

IN THE MATTER OF:)	
)	Chapter 7
THOUSAND ADVENTURES, INC.)	Case No. 97-03618
)	
Debtor.)	Hon. Lee M. Jackwig
<hr style="border: 0.5px solid black;"/>		
)	
ERIC W. LAM, not individually but as)	
Trustee of Thousand Adventures, Inc.,)	
)	
Plaintiff,)	
)	
v.)	Adv. No. 99-99171
)	
REDLAND & ASSOCIATES, INC.)	
)	
Defendant.)	

NOTICE OF TRUSTEE'S MOTION TO COMPROMISE CLAIM

Please take notice that the Trustee on July 12, 2000, filed his motion with the Court to compromise a claim. A copy of that motion is attached to this Notice.

NOTICE IS FURTHER GIVEN THAT **Objections** to said Motion, if any, shall be filed with the Clerk of Bankruptcy Court, P.O. Box 9264, Des Moines, IA 50309-9264, with a copy to the Attorney for the Trustee and the U.S. Trustee, 517 Federal Building, 210 Walnut Street, Des Moines, IA 50309, **on or before 4:30 p.m. on October 15, 2000.**

NOTICE IS FURTHER GIVEN that timely filed objections, if any, will be **set for hearing by separate notice. If no objections are filed timely, an appropriate order may be entered without further notice or hearing.**

DATED this 21st day of September, 2000.

 //s//
DAN CHILDERS ID NO. 404746700
ELDERKIN & PIRNIE, P.L.C.
115 First Ave SE; P.O. Box 1968
Cedar Rapids, IA 52406-1968
PHONE: (319) 362-2137
FAX: (319) 362-1640
ATTORNEY FOR TRUSTEE

Certificate of Service

I hereby certify that a copy of the document on which this appears and all enclosures, was mailed the date indicated below, to all creditors and parties in interest listed on the attached Exhibit B as required by the Bankruptcy Code and Rules and pursuant to the Court's February 14, 2000 order.

Signed: _____ //s// _____

Dated this 22nd day of September, 2000.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF IOWA**

IN THE MATTER OF:)	
)	Chapter 7
THOUSAND ADVENTURES, INC.)	Case No. 97-03618
)	
Debtor.)	Hon. Lee M. Jackwig
<hr style="border: 0.5px solid black;"/>		
)	
ERIC W. LAM, not individually but as)	
Trustee of Thousand Adventures, Inc.,)	
)	
Plaintiff,)	
)	
v.)	Adv. No. 99-99171
)	
REDLAND & ASSOCIATES, INC.)	
)	
Defendant.)	

MOTION TO APPROVE COMPROMISE

Eric W. Lam, in his sole capacity as Chapter 7 Trustee ("Trustee"), through his undersigned counsel, for his motion as above captioned respectfully states:

1. On or about September 10, 1999 the Trustee filed a complaint to avoid the transfer of property which is the subject of this adversary action.
2. The Defendant, Redland and Associates, has answered the Trustee's complaint and denied the allegations therein.
3. After negotiations with the Defendant, the Trustee has determined that it is in the best interest of the bankruptcy estate to settle the matter with Redland and Associates by accepting the sum of \$9,000 in full satisfaction of the Trustee's claim in this matter.
4. The Trustee believes that the estate will realize a greater net recovery through this settlement than from litigating this issue.

WHEREFORE, the Trustee respectfully requests that the Court, after such notice and hearing as may be appropriate, find that the Trustee's Motion to Compromise should be approved, and grant the Trustee such additional or alternative relief as may be just and equitable under the circumstances.

Respectfully submitted,

//s//

DAN CHILDERS ID NO. 404746700
ELDERKIN & PIRNIE, P.L.C.
115 First Ave SE; P.O. Box 1968
Cedar Rapids, IA 52406-1968
PHONE: (319) 362-2137
FAX: (319) 362-1640
ATTORNEY FOR CHAPTER 7 TRUSTEE

Copy to:

Robert J. Laubenthal
Steven H. Krohn
Smith Peterson Law Firm
35 Main Place
P.O. Box 249
Council Bluffs, IA 51502

U.S. Trustee
517 Federal Building
210 Walnut Street
Des Moines, IA 50309

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing instrument was served upon counsel of record for each party to the action on the 10th day of July 2000.

By: U.S. Mail FAX
 Hand Delivered Airborne Express
Signature _____ //s// _____