

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

IN THE MATTER OF:) Chapter 7
) Case No. 97-03618 DJ
THOUSAND ADVENTURES, INC.,)
)
Debtor.)
)

MOTION TO AUTHORIZE DESTRUCTION
OF DEBTOR'S RECORDS AND OTHER FILES

COMES NOW the Trustee in the above-captioned bankruptcy, by and through his undersigned counsel and moves that this Court authorize him to destroy certain documents procured in prosecution of preferences and other avoidable transfer litigation, stating to the Court the following:

1. Counsel for the Trustee was engaged to pursue preference actions on or about March 16, 1999.
2. Counsel has recovered numerous documents from the records of Thousand Adventures, Inc., which include, but are not limited to, approximately 75 banker's boxes of company records involving bills and payments on accounts payables of Thousand Adventures, Inc.
3. Counsel has also received approximately 30 banker's boxes of documents from the Internal Revenue Service.
4. Counsel has filed preference and/or fraudulent transfer actions, which initially, involved over 140 defendants.
5. At the current time, there is one remaining adversary captioned Eric W. Lam as Trustee of Thousand Adventures, Inc. vs. Ohio Edison Co., Adversary Number 99-99146.
6. Trustee has no need for records regarding payments and bills from various vendors whose cases have been settled, dismissed or which he chose not to file due to the size of the potential recovery to further prosecution of these adversary proceedings.
7. Trustee also has no need for the records obtained from the Internal Revenue Service.
8. In light of the foregoing, counsel for the trustee respectfully requests that this Court enter an order authorizing him to destroy the records of the Debtor and its subsidiaries involving accounts payable and other invoices from accounts payable which he has procured in representation of the Trustee for all cases which have either

been settled, or dismissed, as well as those cases which Trustee chose not to pursue as well as those currently pending cases may be settled or come to final judgment in the future. Trustee's counsel further requests authority to destroy all records obtained from the Internal Revenue Service.

9. Counsel requests that he be authorized to destroy records regarding currently pending adversaries 30 days after settlement or other final disposition of the adversary.
10. Counsel requests authority to destroy all other accounts payable records of the Debtor and its subsidiaries in his possession for vendors against whom no avoidable transfer action have been prosecuted. Counsel for the Trustee also requests that he be authorized to destroy all records recovered from the Internal Revenue Service.
11. It is in the best interest of this estate that these excess records be destroyed.

WHEREFORE, Trustee respectfully requests that this Court authorize Trustee's counsel to destroy records regarding accounts payable of the Debtor for each and every case in which no preference actions have been filed; preference actions have been filed and either dismissed or settled; and in the action listed in Paragraph 5, which may come to final judgment or other final resolution with said records not to be destroyed in pending cases until 30 days after entry of final judgment or other final disposition of said cases; Trustee further requests authority to destroy all records received from the Internal Revenue Service.

Dated this 26th day of February, 2003.

Day Rettig Peiffer Johansen, P.C.

By: /s/Joseph A. Peiffer

Joseph A. Peiffer IS9999471

P.O. Box 2877

Cedar Rapids, Iowa 52406-2877

Telephone: (319) 365-0437

ATTORNEY FOR TRUSTEE

CERTIFICATE OF SERVICE

This document was served upon the parties listed on the attached Exhibit "B", which consists of all parties who have made an appearance in any of the adversaries being prosecuted on behalf of the Trustee by Joseph A. Peiffer of Day Rettig Peiffer Johansen, P.C., pursuant to this Court's order limiting notice and a copy of this motion has been served upon Dan Hopper, Chairman of the Thousand Adventures, Inc. Member's Committee for posting on the Worldwide Web at www.natlassoc.com.

Dated: February 26, 2003.

Signed: /s/Sandra L. Brock

Eric W. Lam
Moyer & Bergman
PO Box 1943
Cedar Rapids IA 52406-1943

James L. Snyder
U.S. Trustee
517 Federal Building
210 Walnut Street
Des Moines IA 50309

Dan Hopper, Chairman
TAI Members Committee
4740 Silver Oak Street
Dayton OH 45424-4650

Donald F. Neiman
801 Grand Avenue, Suite 3700
Des Moines IA 50309-2727

Princeton Capital Finance Co. (2002 list)
c/o Rosanne Thomas Matzat
350 Fifth Avenue, Suite 3700
New York NY 10118

Douglas County Bank & Trust (2002 list)
c/o John J. Jolly, Jr.
1500 Woodmen Tower
Omaha NE 68102

North Carolina Attorney General (2002 list)
Consumer Protection Section
c/o Harriet F. Worley
PO Box 629
Raleigh NC 27602-0629

Office of Attorney General (2002 list)
Kristy L. Hiebert
301 SW 10th Street
Topeka KS 66612-1597

Douglas County Bank & Trust (2002 list)
c/o Thomas O. Ashby
Baird, Holm Law Firm
1500 Woodmen Tower
Omaha NE 68102

Heller Financial, Inc. (2002 list)
c/o David G. Stork
3737 Woodland Avenue, Suite 437
West Des Moines IA 50266

Missouri Attorney General (2002 list)
c/o Anne Schneider
PO Box 899
Jefferson City MO 65102

Oppenheimer, Wolff & Donnelly (2002 list)
c/o Shannon M. O'Toole
45 South Seventh Street, Suite 34
Minneapolis MN 55402

Liberty Bank (2002 list)
c/o G. Mark Rice
317 Sixth Avenue, Suite 620
Des Moines IA 50309-4115

Allstate Financial Corp (2002 list)
c/o Gary A. Norton
317 Sixth Avenue, Suite 1200
Des Moines IA 50309

Heritage Finance Company dba (2002 list)
Cascade Finance
c/o Thomas L. Fiegen
PO Box 2849
Cedar Rapids IA 52406-2849

Douglas Enterprises, Inc. (2002 list)
c/o Thomas H. Burke
317 Sixth Avenue, Suite 1200
Des Moines IA 50309

James W. Boyd, Chapter 7 Trustee (2002 list)
Western District of Michigan
c/o Michael I. Conlon
326 East State Street
PO Box 686
Traverse City MI 49685-0686

Mortgage Express, Inc. (2002 list)
c/o John D. Feller
213 Farm Credit Building
206 South 19th Street
Omaha NE 68102

Iowa Department of Revenue & Finance (2002 list)
c/o John Waters
Collection Section, 3rd Floor
PO Box 10457
Des Moines IA 50306

900 Capital Services, Inc. (2002 list)
c/o Stela A. Havkin
6320 Canoga Avenue, Suite 1500
Woodland Hills CA 91367

EXHIBIT B

Eric W. Lam
Moyer & Bergman
PO Box 1943
Cedar Rapids IA 52406-1943

Karen Cordry
National Association of Attorney Generals
750 First Street NE, Suite 1100
Washington DC 20002

Joseph A. Peiffer
Day Rettig Peiffer Johansen, P.C.
PO Box 2877
Cedar Rapids IA 52406-2877

Ronald Peterson
Jenner & Block
Suite 3800, One IBM Plaza
Chicago IL 60611-3514

Tennessee Attorney General (2002 list)
c/o Jeanne C. Schuller
Bankruptcy Unit, Cordell Hull Building
2nd Floor, 425 Fifth Avenue North
Nashville TN 37243-0489

AM Express Travel Related Services (2002 list)
c/o Becket & Lee LLP
PO Box 3001, Dept AC
Malvern PA 19355-0701

Advanta Business Services Corp (2002 list)
c/o Lis Fleischer
1020 Laurel Oak Road
PO Box 1228
Voorhees NJ 08043-1228

J. Eddy Thomas (2002 list)
816 Pelican Bay Drive
Daytona Beach FL 32119

Stanley F. Carroll
Stanley F. Carroll, PC
50 Penn Place, Suite 1300
Oklahoma City OK 73118-1805

James Snyder
Assistant US Trustee
Room 517, 210 Walnut
Des Moines IA 50309-2108

Bill Purdy
Assistant US Attorney
110 East Court Avenue, Suite 286
Des Moines IA 50309

Dan Childers
Elderkin & Pirnie, P.L.C.
PO Box 1968
Cedar Rapids IA 52406-1968

Internal Revenue Service
SPS Stop 5400 DSM
210 Walnut Street
Des Moines IA 50309-2109

Missouri Department of Revenue (2002 list)
c/o Steven A. Ginther
301 West High Street, room 670
PO Box 479
Jefferson City MO 65105-0475

Stanley & Beth Vanden Berg (2002 list)
Torgerson & Vanden Berg Law
200 North Adams
Mason City IA 50401

Iowa Department of Justice (2002 list)
Benjamin E. Bellus
Consumer Protection Division
Hoover State Office Building
Des Moines IA 50319

James Doll (2002 list)
c/o Bert Edwards
119 South 7th Street
Louisville KY 40202