

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

COMES NOW the Trustee by and through his undersigned counsel and hereby moves that this Court enter an order authorizing him to limit notice of his Motion to Authorize Destruction of Debtor's Records and Other Files, stating to the Court the following:

1. This case was filed as an involuntary case on or about August 5, 1997
2. Eric W. Lam was appointed as Trustee on or about February 5, 1998.
3. In excess of 1,900 claims have been filed to date. In addition, more than 6,000 creditors exist.
4. The cost of sending notice to every creditor as well as every party who has requested notice would be staggering and would be of little value.
5. Attached hereto as Exhibit "B" is the list of parties to whom this Court has previously authorized the limitation of notice of settlement of adversaries which includes, but is not limited to, counsel for the Debtor, the United States Trustee, the Chapter 7 Trustee, Dan Hopper as Chairman of the Thousand Adventures, Inc. Member's Committee for posting on the Worldwide Web; Karen Cordry, of the National Association of Attorneys General, as well as all parties who have requested notice on the 2002 list; the Internal Revenue Service and the Iowa Department of Revenue.
6. Limiting notice of this Motion to Authorize Destruction of Debtor's Records and Other Files is in the best interest of this estate and will minimize the cost of carrying out estate administration.

WHEREFORE, Trustee respectfully requests that this Court enter an order limiting notice of this Motion to Destroy Documents to the parties listed on Exhibit "B", attached hereto and incorporated by reference and posting on the Worldwide Web at [www.natlassoc.com](http://www.natlassoc.com).

Dated this 26<sup>th</sup> 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](http://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 10<sup>th</sup> 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 19<sup>th</sup> Street  
Omaha NE 68102

Iowa Department of Revenue & Finance (2002 list)  
c/o John Waters  
Collection Section, 3<sup>rd</sup> 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  
2<sup>nd</sup> 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 7<sup>th</sup> Street  
Louisville KY 40202