

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

IN THE MATTER OF:) Chapter 7 Bankruptcy
) Case Number: 97-03618 DJ
THOUSAND ADVENTURES, INC.,)
Debtor.)

ERIC W. LAM, exclusively in his capacity)
as Trustee of the bankruptcy of:) Adversary No. 99-99150
THOUSAND ADVENTURES, INC.,)
Plaintiff,)
)
vs)
)
COAST ELECTRIC POWER ASSOCIATION,)
)
Defendant)

**NOTICE OF MOTION TO APPROVE COMPROMISE SETTLEMENT WITH DEFENDANT,
COAST ELECTRIC POWER ASSOCIATION, NOTICE OF MOTION TO APPROVE
COMPENSATION FOR ATTORNEY AND NOTICE OF BAR DATE FOR OBJECTIONS**

TO ALL PARTIES IN INTEREST:

NOTICE IS HEREBY GIVEN that on the 26th day of December, 2002, the Plaintiff filed a Motion to Approve Compromise Settlement with Defendant, Coast Electric Power Association (hereinafter referred to as Coast), and to Approve Compensation of Attorney for the Trustee. The Motion to Compromise Settlement with Defendant, Coast, proposes that the Trustee accept the sum of \$1,000.00 in complete and total settlement of Trustee's claims against Defendant. Trustee has identified sizeable transfers having been made to Defendant within the preference period. Trustee's counsel has carefully reviewed the transfers as well as the Defendant's assertion of "new value" as a defense to the preferential nature of the transfers and has concluded that all but approximately \$500 of these transfers constitute either: a) contemporaneous exchange for value; b) subsequent new value; and, c) ordinary course of business. Trustee has determined that some of these defenses may be meritorious. Therefore, Trustee has requested that this Court approve the compromise to ensure the estate receives some settlement without the risk and expense which trial would occasion.

NOTICE IS FURTHER GIVEN that Plaintiff's motion also seeks Court approval of compensation for his attorney of one-third of the settlement in the amount of \$333.33, as was agreed when he was hired to pursue these actions on March 16, 1999.

NOTICE IS GIVEN that the bar date for objection to this Motion to Approve Compromise Settlement and Motion to Compensate Attorney shall be the 15th day of January, 2003. The original of all objections shall be filed with the Clerk of U.S. Bankruptcy Court, P.O. Box 9264, Des Moines, Iowa 50309-9264 with copies to James Snyder, Assistant U.S. Trustee, Room 517, 210 Walnut Street, Des Moines, Iowa 50309-2108, Trustee, Eric W. Lam, Moyer & Bergman, P.L.C., P.O. Box 1943, Cedar Rapids, Iowa 52406-1943 and Counsel for Trustee, Joseph A. Peiffer, P.O. Box 2877, Cedar Rapids, Iowa 52406-2877.

NOTICE IS GIVEN that if objections are filed a hearing shall be set by separate notice.

NOTICE IS FURTHER GIVEN that if no objections are timely filed the Court may enter an order consistent with the relief sought in the Motion.

Dated this 26th day of December, 2002.

Eric W. Lam, Trustee

by /s/ Joseph A. Peiffer
Joseph A. Peiffer IS 9999471
P.O. Box 2877
Cedar Rapids, IA 52406-2877
Telephone: (319) 365-0437
FAX: (319) 365-5866
ATTORNEY FOR CHAPTER 7 TUSTEE

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 the parties in interest listed below as required by the Bankruptcy Rules by Day Rettig Peiffer Johansen, P.C.; it was also transmitted to Dan Hopper, Chairman of the Thousand Adventures, Inc. Members Committee for posting on the National Association of Members web site. In addition, this Notice was mailed to the parties listed on attached Exhibit B, which are the same parties listed in the Motion to Limit Notice filed in Bankruptcy Case #97-03618DJ on December 1, 1999 as amended on January 12, 2000.

Dated: December 26th, 2002.

Signed: /s/ Sandra L. Brock

James Snyder
Assistant U.S. Trustee
Room 517
210 Walnut Street
Des Moines, IA 50309-2108

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

Coast Electric Power Association
PO Drawer 2430
Bay St Louis MS 39521-2430

Matthew T. Cronin
Belin Lamson McCormick Zumbach Flynn, P.C.
The Financial Center
666 Walnut Suite 2000
Des Moines IA 50309-3989

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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, Esq.
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 Peiffer
Day, Rettig, Peiffer, Johansen, PC
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

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 & Pirmie, 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
5 West State Street
Mason City IA 50404

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