



**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
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**TRUSTEE’S MOTION TO APPROVE SETTLEMENT IN COMPROMISE OF A CLAIM**

Trustee, through his undersigned counsel, for his motion as above captioned respectfully states:

1. There is currently pending before this court an adversary proceeding *Eric W. Lam, not individually but as Trustee of Thousand Adventures, Inc., Plaintiff v. George Filios, Defendant, Adversary No. 99-99176*, seeking the recovery of an alleged fraudulent conveyance.

2. After consulting with counsel regarding the possibility of success on the merits of the claim, taking into account the costs of litigation, and considering the costs and difficulties associated with collecting any judgment which may be obtained, the Trustee has determined that it is in the best interest of the estate to settle the adversary action by receiving a sum certain from the defendant in the amount of \$10,000.

The terms of the settlement agreement are set forth in the “Stipulation for Settlement” attached hereto, marked as Exhibit A and incorporated by reference herein.

WHEREFORE, the Trustee respectfully requests that the Court, after notice and hearing, enter an order approving the compromise of the claim that the Trustee has against George Filios according to the terms of the Stipulation for Settlement attached as Exhibit A. The Trustee requests such other or alternative relief as the court may deem just and equitable.

Respectfully submitted,

//s//

**DAN CHILDERS ID NO. 404746700**

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