

**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

MOTION TO APPROVE FORM OF NOTICE

Eric W. Lam, in his sole capacity as Chapter 7 Trustee, and not individually, through his undersigned counsel, for his motion as above captioned respectfully states:

1. Simultaneously with the filing of this motion, the Trustee has filed his motion to approve settlement in compromise of claims.

2. The settlement agreement which is the subject of the aforementioned motion requires the Trustee to give notice to all creditors and parties in interest in this bankruptcy case, including all owners, officers or directors of Thousand Adventures Inc., present or former members, bankruptcy trustees of cases filed for subsidiary corporations, or other interested parties.

3. To accomplish the notice required by the settlement agreement, the Trustee proposed to give notice as follows:

- a. To all parties who have requested notice or are otherwise represented by the "mailing matrix" available from the court.
- b. By posting notice on the member's website as previously required by the court for notice to members.
- c. By sending notice by mail to the last known address of all officers, directors or shareholders of the debtor corporation.

- d. By sending notice to all bankruptcy trustees of pending bankruptcy cases of various subsidiaries of the debtor.
- e. By sending notice to all attorneys known to the debtor for any of the aforementioned parties.
- f. By further notifying members through the efforts of the attorney for the Member Class in the state court class action lawsuit, as prescribed by the court in that action.

4. Any creditor or party in interest who has or might have an interest in the provisions of the settlement attached to the Trustee's motion will receive notice of the Trustee's motion by the above described procedure for notice.

5. This bankruptcy case has been pending for over two years. Any creditor or party in interest who is or would likely have any interest in this settlement that is being proposed by the Trustee in his motion has had more than ample time to file an appearance or otherwise request notice in this bankruptcy case. It is unlikely that there is any entity with an interest in this case who has not made their presence known as of the date of this motion.

WHEREFORE, the Trustee respectfully requests that the court, after notice and hearing, approve notice to the entities set forth in this motion as suggested by the Trustee, and for such further or alternative relief as the court may deem just and equitable under the circumstances.

RESPECTFULLY SUBMITTED.

 /s/

DAN CHILDERS 404746700

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