

Jeremy J. Gugino  
Chapter 7 Bankruptcy Trustee  
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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF IDAHO**

In Re:

ANGELOS, KERRY RANDALL  
ANGELOS, JACQUELINE LEE

Debtor(s)

**CHAPTER 7**

CASE NO. 11-01289-JDP

**MOTION TO EXTEND TIME TO  
OBJECT TO DISCHARGE**

**No Objection.** The Court may consider this request for an order without further notice or hearing unless a party in interest files an objection within 14 days of the date of this notice. If an objection is not filed within the time permitted, the Court may consider that there is no opposition to the granting of the requested relief and may grant the relief without further notice or hearing.

**Objection.** Any objection shall set out the legal and/or factual basis for the objection. A copy of the objection shall be served on the movant.

**Hearing on Objection.** The objecting party shall also contact the court's calendar clerk to schedule a hearing on the objection and file a separate notice of hearing.

COMES NOW the Trustee, **Jeremy J. Gugino**, in the above-entitled matter and moves this Court to extend the deadline to object to the Debtors' discharge. In support of this motion, the Trustee alleges as follows:

1. The Debtors commenced the instant bankruptcy case, *pro se*, on 4/29/11. Doc. No. 1.
2. Debtors first scheduled § 341 meeting of creditors took place on 6/2/2011.
3. The deadline to object to Debtors' discharge is 8/1/2011. Doc. No. 8.

4. Debtors, in their original petition, schedules and statement of financial affairs (“SOFA”), disclosed assets consisting principally of some household goods and a vehicle, debts totaling \$169,365,882.20 and income of \$0.00.
5. Furthermore, Debtors’ SOFA indicated no transfers within two years of filing, a single repossession or foreclosure within a year of filing and ownership in a single business entity.
6. Trustee conducted the initial meeting of creditors and discovered that Debtors likely failed to disclose significant property interests and pre-petition transfers.
7. Trustee has also been receiving information about the Debtors’ pre-petition finances from multiple creditors.
8. Amendments were made to the Debtors’ schedules and SOFA on 7/13/2011 disclosing significant real property holdings, multiple petition transfers and the existence of numerous entities Debtors control. Doc. Nos. 34, 35.
9. During the course of the several continuances made for the Debtors’ § 341 meeting of creditors, Trustee demanded various documents to evidence Debtors pre-petition financial activity, including tax returns for close to a dozen entities controlled by the Debtors and two years of personal and business bank statements.
10. The documents requested by trustee number in the hundreds if not thousands of pages and are approximately a foot tall.
11. Trustee, after reviewing said documents and re-reviewing other information provided by creditors, conducted a 3 hour § 341 meeting of creditors on 7/29/2011.
12. Based on the foregoing, Trustee believes there may be good grounds to object to Debtors’ discharge.

13. However, additional time is required to study Debtor's disclosures and documents provided.
14. In addition, Trustee believes he may require even more documentation evidencing Debtors' prep-petition financial activity.
15. The problem of administering this estate is compounded by the fact that Debtors are still proceeding *pro se* in this case.
16. Trustee requests that the deadline for ALL interested parties to object to Debtors' discharge be extended to November 1, 2011.
17. In the alternative, Trustee requests that the deadline for Trustee and the United States Trustee to object to Debtors' discharge be extended to November 1, 2011.

Date: August 1, 2011

/s/ Jeremy J. Gugino  
Chapter 7 Bankruptcy Trustee

**CERTIFICATE OF SERVICE**

I hereby certify that on this date as indicated below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent a Notice of Electronic Filing to the individuals so noted below. I further certify that, on the same date, I have mailed by United States Postal Service the foregoing document to the following non-EM/ECF Registered Participant(s) either listed below or on an attached list.

*\*Electronic Notification* \_\_\_\_\_

U.S. TRUSTEE  
ECF: [ustp.region18.bs.ecf@usdoj.gov](mailto:ustp.region18.bs.ecf@usdoj.gov)

D BLAIR CLARK  
1513 Tyrell Lane  
BOISE, ID 83706

*Served by U.S. MAIL* \_\_\_\_\_

ANGELOS, KERRY RANDALL  
ANGELOS, JACQUELINE LEE  
P.O. BOX 2506  
EAGLE, ID 83616

/S/ Jeremy J. Gugino  
Chapter 7 Bankruptcy Trustee  
Date: August 1, 2011