

David W. Newman, ISBN 8251  
Mary P. Kimmel, ISBN 3786  
Jonathan D. Wasden, MSBN 100563  
Office of the United States Trustee  
United States Department of Justice  
720 Park Blvd, Ste 220  
Boise, Idaho 83712  
(208) 334-1300  
(208) 334-9756 [Facsimile]  
[ustp.region18.bs.ecf@usdoj.gov](mailto:ustp.region18.bs.ecf@usdoj.gov)

Attorneys for Movant United States Trustee

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF IDAHO

In Re:	)	Case No. 11-01289-JDP
	)	Chapter 7
	)	
KERRY RANDALL ANGELOS	)	
and JACQUELINE LEE ANGELOS,	)	
	)	
Debtors.	)	
_____	)	

**UNITED STATES TRUSTEE’S MOTION FOR ENLARGEMENT  
OF TIME TO SEEK DENIAL OF DISCHARGE UNDER 11 U.S.C. § 727**

The United States Trustee, pursuant to Rules 1017(e), 4004(b) and 9006(b) of the Federal Rules of Bankruptcy Procedure, respectfully moves the Court for an extension of time to file a complaint objecting to discharge under 11 U.S.C. § 727. Without extension, the time period for filing an adversary proceeding seeking denial of discharge under section 727 will expire on August 1, 2011.

1. The debtors, Kerry Randall Angelos and Jacqueline Lee Angelos, (hereinafter “Debtors”), commenced this case on April 29, 2011, by filing a petition for relief under chapter 7

of the Bankruptcy Code. (Docket No. 1)

2. The Trustee has conducted five 341(a) Meetings of Creditors. The final meeting was conducted and concluded on July 29, 2011.

3. The Debtors filed Amended Summary of Schedules and Schedule F on May 16, 2011. (Docket No. 19) The amendments reflect an increase of \$6,365,719 in unsecured debts on Schedule F.

4. The Debtors filed an amended Statement of Financial Affairs (SOFA), Amended Schedules A-D, and Summary of Schedules on July 13, 2011. (Docket nos. 34, 35). The amended schedules reflect an increase of \$3,166,324 in secured debt on Schedule D and a reduction of \$3,166,324 in unsecured debt on Schedule F. The Debtors listed 15 additional properties that were not previously disclosed on Schedule A. The Debtors' Amended SOFA also contained several new ownership interests in companies not previously disclosed on SOFA Q.

18.

5. The Debtors financial affairs are complicated and involve millions of dollars of assets and liabilities, and ownership interests in many companies. The Trustee has compiled voluminous financial records which he has shared with the United States Trustee. The United States Trustee has, and continues to, review the documents provided by the Trustee through the Debtors.

6. The United States Trustee requires additional time to review the Debtors' recently filed amendments to their SOFA and Schedules, their testimony in their meeting of creditors (the most recent of which was July 29, 2011), and the voluminous financial documents provided by the Trustee, to complete the investigation to determine whether there is cause to file a complaint

objecting to the Debtors' discharge.

WHEREFORE, the United States Trustee requests an extension of the August 1, 2011 deadline to file a complaint objecting to discharge under 11 U.S.C. § 727 until September 30, 2011.

Dated: August 1, 2011

ROBERT D. MILLER JR.  
United States Trustee

/s/ Mary P. Kimmel  
MARY P. KIMMEL  
Attorney for Movant United States Trustee  
[Non CM/ECF] [mary.p.kimmel@usdoj.gov](mailto:mary.p.kimmel@usdoj.gov)

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 1, 2011, I caused to be filed a copy of the foregoing electronically through the CM/ECF system, which causes the following parties to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Jeremy J. Gugino, Chapter 7 Trustee

AND I FURTHER CERTIFY that on such date I caused to be served the foregoing on the following non-CM/ECF Registered Participants via first class mail, postage prepaid addressed as follows:

Kerry Randall Angelos  
Jacqueline Lee Angelos  
P.O. Box 2506  
Eagle ID 83616

Dated: August 1, 2011

/s/ Carolyn Wolfe  
CAROLYN WOLFE