

Jeremy J. Gugino
Chapter 7 Bankruptcy Trustee
410 S Orchard St.
Suite 144
Boise, ID 83705
(208) 342-1590
gugino@cableone.net

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF IDAHO**

In Re:

ANGELOS, KERRY RANDALL
ANGELOS, JACQUELINE LEE

Debtor(s)

CHAPTER 7

CASE NO. 11-01289-JDP

**SECOND 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 pursuant to Fed. R. Bankr. P. 4004(b) and requests that the deadline to object to the Debtors' discharge be extended until December 1, 2011. In support of this motion, the Trustee alleges as follows:

1. Trustee incorporates all assertions made in his first motion to extend the time to object to Debtors' discharge as set forth at Doc. No. 43.
2. The deadline to object to Debtors' discharge was extended to 11/1/2011.

3. In addition to the facts set forth in Trustee's original motion, Trustee has, within the past one week period, become aware of the following:
 - a. Debtors maybe attempting to collect, either individually or through an entity or entities which Debtors have testified are worthless, rent from real property being used for farming operations in Caldwell, Idaho.
 - b. Trustee is expecting documents and other information from a creditor of Debtors who has discovered e-mails, financial records and or tax returns which were abandoned by the Debtors. It is unclear whether Trustee has previously been furnished copies of these documents, however, said documents are believed to contain information about the Debtors' finances and financial situation.
4. Given the timing of the above information, trustee asks that the court grant additional time to object to the Debtors' discharge so that he may (1) review the information and (2) speak with the Debtors about said information.
5. Trustee would also like additional time so he may share this information and his findings with the U.S. Trustee.

For the above reasons, the Trustee respectfully requests the Court grant Trustee's motion and extend the deadline for the Trustee and U.S. Trustee to object to the Debtors' discharge until December 1, 2011.

Date: November 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

david@wishneylaw.com

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: November 1, 2011