

LAW OFFICES OF GEORG JENSEN
1613 Evans Avenue
Cheyenne, Wyoming 82001
(307) 634-0991

FILED

FEB 07 2003

Joyce W. Harris, Clerk
United States Bankruptcy Court
District of Wyoming

Debtor's Attorney

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF WYOMING**

In Re:)
)
KENNETH RICHARD KEELER,)
)
)
Debtor.)

CASE NO. 02-21121

**MOTION TO VACATE HEARING
ON OBJECTION TO EXEMPTIONS**

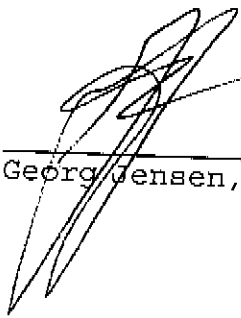
COME NOW THE DEBTOR, by and through counsel, Georg Jensen, in the above entitled proceeding, and respectfully moves the court for an order vacating the hearing set herein for February 18, 2003 on the Trustee's objection to exemptions filed herein, and IN SUPPORT OF this motion states to the court as follows:

1. That the debtor has furnished the Trustee and his attorney with voluminous documents in an effort to resolve the objection to exemptions claimed herein.
2. That the trustee and his attorney have reviewed such documents and requested additional information, some of which is in storage and over 18 years old. That such documents may not be able to be produced before the hearing as scheduled.
3. That most of the objections to the exemptions have been resolved and will be settled. The parties believe that if the documents requested reflect the information which has been represented that the remaining objections to the exemptions will also be settled.

4. That it would be appropriate under these circumstances to vacate the hearing and in the event the objections cannot be fully resolved then either party could request that the same be rescheduled.

5. That the trustee and his counsel have consented to and join in this request.

Dated: February 7, 2003



Georg Jensen, Debtors' Attorney

CERTIFICATE OF SERVICE

Georg Jensen hereby certifies that a true and correct copy of the foregoing motion was served upon the following parties this date by first class mail, postage prepaid, to their office addressed as follows:

Frank Watkins, Esq.
P.O. Box 1811
Riverton, WY 82501

Gary Barney, Trustee
267 Main Street
Lander, WY

Dated: December 5, 2002



Georg Jensen