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HON. PHILIP H. BRANDT
Chapter 15

Hearing Location: 700 Stewart
Street, Room 8106, Seattle
Hearing Date: June 14, 2007
Hearing Time: 9:30 a.m.
Response Time: June 7, 2007

10 UNITED STATES BANKRUPTCY COURT
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE

12 In Re:)
13 Ian Gregory Thow,)
14 Debtor.)
15)

CASE NO. 05-30432-PHB
DECLARATION OF GREGORY
R. FOX

16 I, Gregory R. Fox, declare as follows:

17 1. I am one of the attorneys representing Wolrige Mahon, Ltd., the foreign
18 representative (the "Canadian Trustee") in this matter. I am competent to testify and make
19 this declaration based upon my own personal knowledge.

20 2. While Rule 37 does not apply to the Canadian Trustee's Motion because
21 of the Debtor's non-compliance with the Court's order, I nonetheless placed a call to
22 Debtor's counsel to discuss the Debtor's failure to adequately respond to the Written
23 Questions.

24 3. Mr. Feinstein advised that his client would not answer the Written
25 Questions or subpoena unless the Court ordered him to do so.

26
DECLARATION OF GREGORY R. FOX - 1

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4. In sum, we have conferred with opposing counsel in a good faith attempt to secure the materials and information requested in the Written Questions and subpoena.

I declare that the foregoing is true and correct to the best of my knowledge under penalty of perjury of the laws of the State of Washington.

DATED this 21st day of May 2007, at Seattle, Washington.

/s/ Gregory R. Fox
Gregory R. Fox

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CERTIFICATE OF SERVICE

I hereby certify that on May 21, 2007, I caused to be served a true and correct copy of the foregoing document on CM/ECF Registered Participants as reflected on the Notice of Electronic Filing.

I further certify that I have mailed the foregoing by United States Postal Service from Seattle, Washington and sent via email to the following non-CM/ECF participants:
N/A

LANE POWELL PC

By /s/ Gregory R. Fox
Bruce W. Leaverton, WSBA No. 15329
Gregory R. Fox, WSBA No. 30559
Attorneys for Foreign Representative
Wolrige Mahon, Ltd.