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Subject: Notification of Service for Case No. 18-2015-CV-00240 (Public Service Commission, et al. vs. Grand Forks Bean Company, Inc.)

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Filing Desc: Claimant Bremer Bank National Association's Objection to Report and Recommendation of Trustee

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Notification of Service – Objection to Report and Recommendation of Trustee

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IN DISTRICT COURT, GRAND FORKS COUNTY, STATE OF NORTH DAKOTA

Public Service Commission,)
)
 Petitioner,)
)
 vs.)
)
 Grand Forks Bean Company, Inc.,)
 Auto-Owners Insurance Company,)
)
 Respondents,)
)
 _____)
 PSC Case No. GE-15-36)

Civil No. 18-2015-CV-00240

**CLAIMANT
BREMER BANK, NATIONAL
ASSOCIATION'S OBJECTION TO
REPORT AND RECOMMENDATION
OF TRUSTEE**

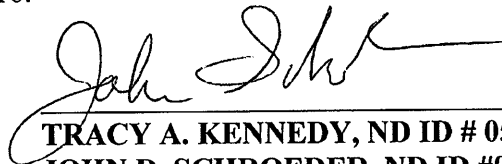
¶1 Bremer Bank, National Association (hereinafter "Bremer Bank"), having timely filed a claim in the above-entitled proceeding hereby brings the following objection to the Report and Recommendation of the Trustee brought by the Petitioner Public Service Commission (hereinafter "Commission").

¶2 This is a grain warehouse insolvency proceeding instituted under North Dakota Century Code chapters 60-02, 60-04, and 60-10. The Commission has recommended to the court that Bremer Bank, National Association "does not have a valid claim under N.D.C.C. ch. 60-02 or 60-04." Bremer Bank hereby objects to the proposed distribution of any assets being administered by the Commission as proposed in the Report and Recommendation, and rather prays that the court order the Commission to distribute sufficient funds to Bremer Bank to first satisfy Bremer Bank's claim in full prior to distribution to other claimants. The funds held by the Commission are cash proceeds of collateral pledged by Grand Forks Bean to Bremer Bank in which Bremer Bank claims a first priority lien.

¶3 This Objection is based on the Brief in Support of the Objection, the Claim of Bremer Bank filed herein at Doc. ## 31-41, the depositions of the following individuals: Timothy Erdmann,

Susan Richter, Nick Adams, Ron Adams, Duane Altendorf, Curt Amundson, Brent Baldwin, Beth Nelson, and Chuck Nelson, upon all pleadings and papers on file herein, and upon the evidence and arguments of counsel to be submitted at any hearing held herein.

Dated this 3 day of March, 2016.



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