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**Notification of Service – Brief in Support of
Objection to Proposed Commission Fees and
Expenses**

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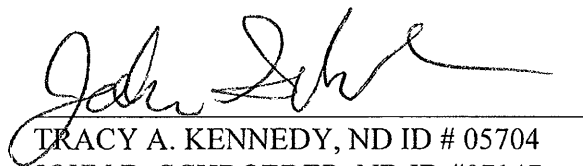
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the assets were collected by the Commission and placed into trust. The mere authorization to pay Commission expenses out of the trust fund does not mean that those trust funds must be taken away from a secured creditor to do so. Second, while the statutory scheme certainly permits the Commission to obtain payment of costs and expenses from the trust assets, the grain inventory proceeds are only one such source of the trust assets. In fact, other ready sources of trust assets could be available to pay the costs and expenses of the Commission, including the bond. N.D.C.C. § 60-04-03.1(2). The Commission can and should also properly have its costs and expenses reimbursed from the credit-sale contract indemnity fund as well. N.D.C.C. § 60-10-09. It would be inequitable for the Commission to be paid its costs and expenses over the perfected security interest of Bremer Bank out of the inventory proceeds of Grand Forks Bean when the Commission has other sources of repayment available to it that would not defeat and usurp Bremer Bank's legal lien rights. Bremer continues to object to any payment of expenses/fees of the Commission to the extent the fees/expenses are paid by the proceeds of collateral that had been given by Grand Forks Bean to Bremer Bank.

Dated this 20 day of May, 2016.



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