

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

**Jointly Administered under
Case No. 08-45257**

Petters Company, Inc., et al.,

Court File No. 08-45257

Debtors.

Court File Nos.:

(includes:

**Petters Group Worldwide, LLC;
PC Funding, LLC;
Thousand Lakes, LLC;
SPF Funding, LLC;
PL Ltd., Inc.;
Edge One, LLC;
MGC Finance, Inc.;
PAC Funding, LLC;
Palm Beach Finance Holdings, Inc.)**

**08-45258 (GFK)
08-45326 (GFK)
08-45327 (GFK)
08-45328 (GFK)
08-45329 (GFK)
08-45330 (GFK)
08-45331 (GFK)
08-45371 (GFK)
08-45392 (GFK)**

**Chapter 11 Cases
Judge Gregory F. Kishel**

**UNITED STATES TRUSTEE'S OBJECTION TO MOTION BY
APRIVEN PARTNERS, LP; C&C CAPITAL, LLC; AND TRUE NORTH FUNDING,
LLC TO CONDUCT CONSTRUCTIVE-TRUST DISCOVERY PURSUANT TO RULE
2004**

COMES NOW the United States Trustee through his undersigned attorney and objects to the motion of Apriven Partners, LP; C&C Capital, LLC; and True North Funding, LLC to conduct constructive-trust discovery pursuant to Rule 2004 (Motion). In support of his objection, he states the following:

1. A hearing has been scheduled in this matter on December 9, 2008 at 1:30 p.m. in Courtroom 2A, United States Courthouse, 316 North Robert Street, St. Paul, MN 5510, before the Honorable Gregory F. Kishel, United States Bankruptcy Judge for the District of Minnesota.

2. The United States Trustee has standing to file this objection pursuant to 11 U.S.C. § 307 and 28 U.S.C. § 586(3)(A).

OBJECTION

3. For the reasons set forth in the objection filed by Peters Group Worldwide, LLC and Peters Company, Inc. to the Motion, the United States Trustee hereby objects to relief requested by Apriven Partners, LP; C&C Capital, LLC; and True North Funding, LLC to conduct constructive-trust discovery pursuant to Rule 2004.

WHEREFORE, the United States Trustee hereby requests that the court enter an order denying the Motion and for such other relief as may be just and equitable.

Dated: December 4, 2008

Habbo G. Fokkena
United States Trustee
Region 12

By: /s/ Robert B. Raschke
Robert B. Raschke
Assistant U.S. Trustee, 161081
Office of the U.S. Trustee
U.S. Courthouse, Suite 1015
300 South Fourth Street
Minneapolis, MN 55415
TELE: (612) 664-5500

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Judge Gregory F. Kishel**

CERTIFICATE OF SERVICE

Audrey Williams of the United States Trustees Office of Minnesota being first duly sworn on oath, states that on December 4, 2008 she served the following documents:

1. United States Trustee's Objection to Motion by Apriven Partners, LP; C&C Capital, LLC; and True North Funding, LLC to Conduct Constructive-Trust Discovery Pursuant to Rule 2004

electronically by Notice of Electronic Filing, and upon all parties who have requested service in these case by filing the same via ECF with the Bankruptcy Court in the District Minnesota.

/s/Audrey Williams
Audrey Williams