

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI

IN RE:)
)
 LAURA LEE SHOOP,) Case No. 09-50639-jwv
)
) Debtor.)
)
 BRUCE E. STRAUSS, TRUSTEE,)
)
) Plaintiff,)
)
 v.)
)
 LAURA LEE SHOOP) Adv. No. 10-05005-jwv
)
) Defendant.)

**JOINT MOTION BY CHAPTER 7 PANEL TRUSTEE AND DEBTOR
FOR DISMISSAL OF ADVERSARY PROCEEDING AND DISMISSAL
OF BANKRUPTCY CASE WITH PREJUDICE**

The chapter 7 panel trustee, Bruce E. Strauss and debtor-defendant, Laura Lee Shoop, by their respective counsel, jointly move this court to dismiss this adversary proceeding and to dismiss the bankruptcy case with prejudice, pursuant to the within stipulation between the parties.

In support hereof, the parties jointly state as follows:

1. That debtor filed a chapter 7 voluntary petition on July 21, 2009.
2. That on February 2, 2010, the chapter 7 panel trustee filed a complaint objecting to discharge of debtor. Alleging, among other things, that the debtor had within one year before the date of the filing of the bankruptcy petition and with the intent to hinder, delay or defraud a creditor or an officer of the bankruptcy estate, removed and concealed certain property and that she continued such activity subsequent to the filing of the bankruptcy trustee.

EXHIBIT A

The panel trustee further contends that the defendant-debtor failed to identify certain information required by the bankruptcy schedules and statement of affairs.

3. That in order to resolve this adversary proceeding and pending bankruptcy case, the parties hereby stipulate and request that this court approve the dismissal of this adversary proceeding without prejudice and dismissal of the underlying bankruptcy case, with prejudice with the debtor re-filing the case under Title 11 of the United States Code for a period of three years from the date of the entry of the order dismissing the bankruptcy case.

4. That the chapter 7 panel trustee believes that the resolution is in the best interests of the bankruptcy estate and creditors. The chapter 7 panel trustee has consulted with the Office of the United States Trustee for Region 13 and the United States Trustee has no objection to dismissal of the bankruptcy case under the provisions proposed in this joint motion and stipulation.

WHEREFORE, Bruce E. Strauss, chapter 7 panel trustee and debtor-defendant jointly request this court's order (1) dismissing this adversary proceeding without prejudice; (2) dismissing the bankruptcy case with prejudice to debtor re-filing the case under Title 11 of the United States Code for a period of three years from the date of entry of the order dismissing the bankruptcy case; and, (3) for such further and other relief as the court may deem just and proper.

Respectfully submitted,

**BRUCE E. STRAUSS, CHAPTER 7 PANEL
TRUSTEE AND PLAINTIFF**

By: /s/ bruce e. strauss
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ATTORNEY FOR DEFENDANT-DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was served upon all persons requesting Electronic Case Filing (ECF) notification in the adversary proceeding on August 30, 2010.

/s/ bruce e. strauss _____

BRUCE E. STRAUSS