

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
(Bankruptcy Division)

IN THE MATTER OF:

Chapter 7

THOUSAND ADVENTURES, INC.,

Case No. 97-03618-DJ

Debtor.

Hon. Lee M. Jackwig

ERIC W. LAM, not individually
but as Trustee of Thousand Adventures, Inc.,

Plaintiff,

v.

Adversary No. 99-99177

TRAVEL AMERICA, INC., et al.,

Defendants.

TONY ROSS, et al
Individually and on behalf of all other
persons similarly situated,

Intervenors,

**INTERVENERS'
STATUS REPORT**

vs.

TRAVEL AMERICA, INC.,

Defendants.

COMES NOW, Tony Ross, by and through his attorney, Douglas H. Napier, and in compliance with the Court's Order dated June 21, 2000, gives the following Status Report:

1. Following the Court's Order permitting the intervention of Tony Ross, et al, the Intervenors filed a Complaint on July 6, 2000. The Defendant filed a timely Answer.

2. The Interveners have attempted to conduct discovery in this matter by serving a Request for Production of Documents and a Request for Admissions upon the Defendant. The Defendant objected to all of the Interveners' Request for Production of Documents, and a Motion to Compel was filed on September 14, 2000. As of the date of this report, no resistance to the Motion to Compel has been filed.

3. The undersigned counsel and counsel for Travel America have conferred regarding mediation. Both agree that it is premature to discuss mediation until the Court rules on the Interveners' anticipated Motion for Class Certification.

4. Counsel for the Defendant filed a Request for a Jury Trial with its Answer and the Interveners have previously consented to Judge Jackwig presiding over a jury trial of all issues.

5. The Interveners have requested available deposition dates for key employees of the Defendant, but no deposition dates have been scheduled yet.

6. The Defendant has served Interrogatories and Request for Production of Documents on the Interveners. Interveners are in the process of responding to those discovery requests.

7. The Interveners need to complete additional discovery before filing their Motion for Class Certification. Given the pending discovery disputes, it is not likely that this matter will be ready to proceed to trial before March 2001.

Respectfully submitted,

//s//

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ATTORNEY FOR INTERVENERS

CERTIFICATE OF SERVICE

The undersigned certifies that on the ____ day of _____, 2000, the foregoing instrument was served upon all parties to the above case by depositing a copy thereof in the U.S. Mail, postage prepaid, in an envelope addressed to each of the attorneys or parties of record herein as set forth below:

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By: _____ //s//
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