

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH DAKOTA

In re:) Case No. 11-40680
) Chapter 11
SCOTT OLSON DIGGING, INC.,)
Tax ID/EIN XX-XXX9319) OBJECTION TO MOTION TO DISMISS
)
Debtor.

1. On October 4, 2011 American Bank and Trust filed a Motion requesting the Court dismiss the above captioned Chapter 11 bankruptcy case.
2. SD One Call, a state agency, is a listed creditor.
3. SD One Call objects to the Motion and requests the Court allow Scott Olson Digging, Inc. a reasonable opportunity for rehabilitation through the Chapter 11 case. If the Court dismisses this case, none of the unsecured creditors including SD One Call, will receive payment.

Dated: October 27, 2011

SD Public Utilities Commission

/s/ Kara Semmler
Kara Semmler
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In re:) Case No. 11-40680
) Chapter 11
SCOTT OLSON DIGGING, INC.,)
Tax ID/EIN XX-XXX9319) CERTIFICATE OF SERVICE
)
Debtor.)

I, Kara Semmler, a duly licensed and practicing attorney in the State of South Dakota, hereby certify that on this date a true and correct copy of the Objection to the Motion to Dismiss was served upon the following parties via electronic notification:

- Patrick T. Dougherty pat@ptdlawfirm.com
- Keith A. Gauer kgauer@dehs.com
- Bruce J. Gering ustpreion12.sx.ecf@usdoj.gov
- Clair R. Gerry gerry@sgsllc.com
- Kent R. Cutler kentc@cutlerlawfirm.com
- Stephanie C. Bengford usasd.ecfbankruptcy@usdoj.gov
- Clifton E. Katz katzlaw@qwestoffice.net

Service was made by first-class mail, postage prepaid to the following addresses:

Glenn's OK Tire, Inc.
Attn: Gary Halse
387 4th Street NW
Huron, SD 57350

Olsen Implement
Attn: Steve Marcus
2025 Hwy 14
Huron, SD 57350

Eugene Olson
1353 Lawnridge SE
Huron, SD 57350

Lisa Boomsma
L. Boomsma, CPA, PC
1510 Dakota Ave South
Huron, SD 57350

Dated at Pierre, South Dakota this 27th day of October, 2011

South Dakota Public Utilities Commission

/s/ Kara C. Semmler

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