

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF RHODE ISLAND**

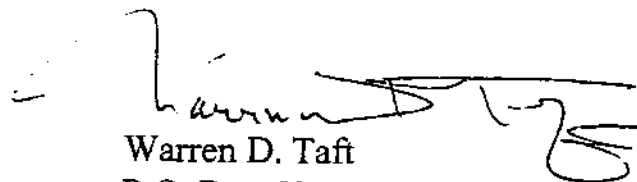
**In re: Cumberland Investment
Corporation
Debtor(s)**

**Bk. No. 89-11051
Chapter 7**

**PETITIONER'S MOTION IN OBJECTION TO CHAPTER 7
TRUSTEE'S MOTION TO STRIKE MOTION TO COMPEL
PRODUCTION OF REQUESTED DOCUMENTS FROM
CHAPTER 7 TRUSTEE**

Now comes Warren D. Taft, Petitioner, and aggrieved party in the
above captioned matter and objects to the Chapter 7 Trustee's MOTION TO
STRIKE for the reasons set forth in the attached memorandum.

Respectfully submitted,



Warren D. Taft
P.O. Box 52
Mendon, MA 01756
508 473-2846

**UNITED STATES BANKRUPTCY COURT
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**In re: Cumberland Investment
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**PETITIONER'S MEMORANDUM IN OBJECTION TO
CHAPTER 7 TRUSTEE'S MOTION TO STRIKE MOTION TO
COMPEL PRODUCTION OF REQUESTED DOCUMENTS
FROM CHAPTER 7 TRUSTEE**

Now comes Warren D. Taft, Petitioner, and "aggrieved party" in the above captioned matter and objects to the Chapter 7 Trustee's MOTION TO STRIKE and states for cause the following:

1. Petitioner has standing because he is an "aggrieved party" whose pecuniary interests are directly affected by the decrees and judgments of the Bankruptcy Court of the District of Rhode Island.

2. Petitioner does not consider himself as a creditor of Cumberland Investment Corporation since Petitioner gave his property to Cumberland Investment Corporation in order that they act as his agent in the disposition of said property.

3. Petitioner has attempted to obtain an accounting of the assets of the estate of Cumberland Investment Corporation for over 5 years in an attempt to find out what has happened to his coins.

4. The court has granted the sale of some 8,600 silver dollars on June 3, 1996 and 7,491 silver dollars on December 7, 1999, over the objections of the Petitioner.

5. It is now quite obvious that the objections of the Petitioner were more than warranted in that the inventories in both auctions do not reconcile with those silver dollars allegedly shipped for auction.

6. It appears that the Chapter 7 Trustee knew or should have known that Mr. Cadigan signed for 7,992 Silver Dollars, that were returned back to the possession of FDIC, from Special Agent John Truslow, FBI on 1/8/99. Subsequently these 7,992 silver dollars were shipped by Dunbar Armored Air to Spink America also on 1/8/99. However, for reasons not known to Petitioner, the Trustee misinformed the court and all parties by listing 7,491 Silver Dollars to be sold in the December 7, 1999 auction in NOTICE OF INTENDED PUBLIC SALE OF ESTATE PROPERTY, dated 10/29/99.

7. Based upon newly discovered evidence, "redemption client coins" that were not used in the criminal trial of Mr. Chorney were contained in the 183 silver dollars that Mr. Cadigan received on 1/8/99 and subsequently sold as assets of the estate of Cumberland Investment Corporation on December 7, 1999. Petitioner is prepared to present an offer of proof to the

Court concerning this allegation.

8. The 1/8/99 receipt to return items to Frank Cadigan, FDIC, raises still more questions. One question being what was the inventory of a set of 183 U.S. Silver Dollars, as listed on line 2 of this document. Was an inventory of these 183 silver dollars taken by the FBI or U.S. Attorney? Secondly, where did this set of 183 silver dollars come from?

9. Petitioner would like the Trustee to provide an inventory of which assets have not been sold yet, as well as an accounting of what interest Republic Credit Corporation I has in these assets from the Trustee.

10. Petitioner would like to obtain more information concerning the "specialist who dealt with the original inventory, counting, and cataloguing of the silver dollars [who] is no longer employed with Spink America" as stated in the May 1, 2000 letter from Joseph Francaviglia, Spink America to Jason Monzack.

Wherefore, Petitioner requests that the court Compel the Production of all Documents requested in the letters dated April 20, 2000, June 7, 2000, and to supply Petitioner with documents in his possession that are listed in the May 17, 1995 letter as well as this instant pleading. Failure to provide the requested production would be manifest injustice that would

substantially prejudice Petitioner and other aggrieved parties.

Respectfully submitted,

Warren D. Taft
P.O. Box 52
Mendon, MA 01756
508 473-2846

CERTIFICATION

I hereby certify that a true copy of the above was sent on this
16th day of December 2000 by first class mail to the following:

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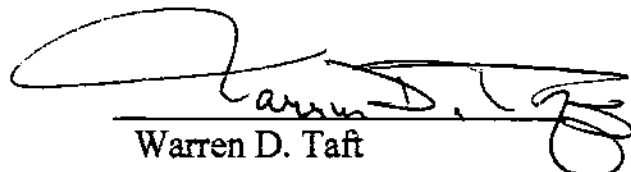
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Warren D. Taft