

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : Chapter 7
Nina Marie Kinard : Case No.: 13-15224-jkf
Debtor :

Tracy Bishop and :
Pamela Brooks and :
Peggy Cunningham and : Adversary Proceeding # 13-00485
Natividad Reyes, :
Plaintiffs :
v. :
Nina Marie Kinard :
Debtor/ Defendant :

RESPONSE TO COMPLAINT IN OBJECTION TO DISCHARGE OF DEBTOR

Now comes Debtor/Defendant, Nina Marie Kinard, by her counsel, Christian A. DiCicco, Esquire, and responds as follows:

1. thru 7. Admitted.
8. No response required.
9. thru 13. Admitted
14. Admitted in Part/Denied in Part. Debtor earned no income either as an Officer or shareholder of any incorporated or unincorporated business, partnership, or joint venture during any time period relevant to the instant Bankruptcy Petition.
15. Admitted in Part/Denied in Part. Admitted that Debtor did serve as an officer and shareholder of Lee's Industries, Inc. Denied that Debtor acted as an officer or shareholder of Lee's Home Health Services, Inc. or Lee's Companies, Inc. from at least 2007 to 2012.

16. Admitted.
17. Admitted.
18. Admitted.
19. Admitted
20. Admitted.
21. Denied. By way of further answer, Debtor earned no income as an officer or shareholder of Cren, Inc.
22. Admitted.
23. Denied. Strict proof is demanded at trial.
24. Denied. By way of further answer, this is a conclusion of law to which no response is required.
25. No further response required.
26. Admitted in Part/Denied in Part. Admitted that Debtor did serve as an officer and shareholder of Lee's Industries, Inc. Denied that Debtor acted as an officer or shareholder of Lee's Home Health Services, Inc. or Lee's Companies, Inc. from at least 2007 to 2012.
27. Denied.
28. Admitted in Part/Denied in Part. Admitted that Debtor did serve as an officer of Cren, Inc. Denied that Debtor was a shareholder of Cren, Inc.
29. Denied.
30. Denied. Strict proof is demanded at trial.

31. Denied. By way of further answer, this is a conclusion of law to which no response is required.

32. No further response required.

33. Admitted in Part/Denied in Part. Admitted that Debtor did serve as an officer and shareholder of Lee's Industries, Inc. Denied that Debtor acted as an officer or shareholder of Lee's Home Health Services, Inc. or Lee's Companies, Inc.

34. Admitted in Part/Denied in Part. Admitted that Debtor did serve as an officer of Cren, Inc. Denied that Debtor was a shareholder of Cren, Inc.

35. Admitted.

36. Admitted in Part/Denied in Part. Admitted that Debtor listed her real estate rental income as business income on Schedule I. Denied that Debtor earned income from the operation of a business or profession or farm, or as an officer or director in any corporations.

37. Denied. Strict proof is demanded at trial.

38. Denied. By way of further answer, this is a conclusion of law to which no response is required.

WHEREFORE, Debtor prays that this Honorable Court enter judgment against Plaintiffs and in favor of Debtor/Defendant and enter an order granting Debtor a Discharge under section 727 of Title 11, United States Code.

Date: October 17, 2013

Respectfully submitted:

/s/ Christian A. DiCicco, Esquire

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