

Chapter 13 Attorney Fees After Conversion Or Dismissal

There are different problematic situations that can arise when a Chapter 13 case is converted or dismissed while the trustee is holding payments from the debtor. What should be done with the funds depends on whether a plan has been confirmed.

No confirmation at the time of conversion or dismissal.

Section 1326(a)(2) deals with any payment received before plan confirmation. It provides that if a plan is not confirmed, "the trustee shall return any such payments... to the debtor." The only exceptions are for payments due as adequate protection to secured creditors and for administrative claims allowed under § 503(b), which would include allowed fees and expenses of the debtor's attorney.

However, the statute does not allow pre-confirmation payments to be retained by the trustee in anticipation of later fee awards. Thus, if a fee application has been filed at the time conversion or dismissal is sought in a case without a confirmed plan, the court would have to rule on the application before conversion or dismissal in order to allow any part of the payments to be given to the attorney. On the other hand, if the debtor has made no payments before a dismissal of the case, an award of attorney fees and expenses would serve no purpose, since there would be no funds from which it could be paid.

There are two differences between conversion or dismissal with respect to fee allowances. The first is that conversion can be accomplished by notice, without a motion – giving the court no opportunity to check for pending fee applications before the matter is moot. The second is that in conversion, there is the possibility of an asset case, and if so the court should rule on a fee application even after conversion, so that estate assets remaining after Chapter 7 administrative

expenses can be paid to the debtor's Chapter 13 attorney. Any post-conversion application, however, would be made in the Chapter 7 case.

Conversion or dismissal after plan confirmation.

Section 1326(a)(2) also sets out what the trustee must do with payments that were received pre-confirmation and that the trustee is holding at the time of confirmation: "If a plan is confirmed, the trustee shall distribute any [preconfirmation] payment in accordance with the plan as soon as is practicable." This provision requires the trustee to distribute all of the pre-confirmation payments as provided for by the plan regardless of whether there is a conversion or dismissal thereafter.

Payments received by the trustee after confirmation are governed by § 1326(c): "Except as otherwise provided in the plan or in the order confirming the plan, the trustee shall make payments to creditors under the plan." Like § 1326(a)(2), this provision requires the trustee to distribute all of the post-confirmation payments as directed by the plan, regardless of conversion or dismissal. To the extent that a fee application has been granted, the debtor's attorney would get the same payment of fees as in a regular plan distribution from the trustee. If a fee application is not granted before conversion or dismissal, no part of the funds held by the trustee could be paid to the debtor's attorney.

In re Parker, 400 B.R. 55, 62 (Bankr. E.D. Pa. 2009), and *In re Parrish*, 275 B.R. 424, 433 (Bankr. D.D.C. 2002), support this reading. But *In re Tran*, 309 B.R. 330,338 (9th Cir. BAP 2004) holds that dismissal has a different effect, citing § 349 (b) ("Unless the court, for cause, orders otherwise, a dismissal of a case other than under section 742 of this title-... (3) reverts

(Continued on page 2.)



Jurisdiction x 2



Desperate times cause some debtors to perform some desperate acts. Recently we have seen an up-tic in the number of pro se bankruptcy cases followed by pro se appeals. The bankruptcy cases are par for the course. However, I've found myself remembering those law school days when dealing with the appeals. The first hurdle when dealing with an appeal is jurisdiction. Black's law dictionary defines jurisdiction as: The authority of a court to hear and decide a case. To make a legally valid decision in a case, a court must have both "subject matter **jurisdiction**" (the power to hear the type of case in question, which is granted by the state legislatures and Congress) and "personal *jurisdiction*" (the power to make a decision affecting the parties involved in the lawsuit, which a court gets as a result of the parties' actions).

Interestingly enough, timing also plays a hand in jurisdiction. For example, an appeal to the 7th Circuit Court of appeals can divest the court of jurisdiction unless the appeal was timely filed. When appealing decisions to higher courts, timing often can mean everything so check your rules before you file.

O. Anthony Olivadoti, Managing Attorney

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We also ask that anyone who attends a seminar please be prepared to furnish the committee with a detailed article on its subject.	
You may also view this edition of THE MARSHALL CHRONICLES , as well as all the previously published issues, all in full color, on the Chapter 13 Trustee website at http://www.chicago13.com/ .	

Chapter 13 Attorney Fees After Conversion Or Dismissal



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the property of the estate in the entity in which such property was vested immediately before the commencement of the case under this title.") This reading would transfer the funds held by the trustee at the time of dismissal to the debtor, with no payment to any claimants, including the debtor's attorney. The problem with this approach is that once the debtor transfers property of the estate to the trustee, it is no longer "property of the estate." Rather, it's property of the trustee, held pursuant to the terms of the plan, and subject to § 1326(c). Moreover, except for our confirmation order providing otherwise, the property of the estate would vest in the debtor at confirmation under § 1327(b). Such vesting has no effect on distribution of payments received by the trustee.

Local Rule

Our Local Rule 5082-2(E) requires a court to retain jurisdiction after dismissal for the purpose of accepting fee applications and if no applications are filed within the time of retained jurisdiction, the rule provision allows for distribution of "any funds the trustee has on hand in accordance with the policies of the trustee's office." This rule provision contradicts the Code and so should not be followed. The court is considering a revision. *Judge Eugene R. Wedoff*



U.S. Bankruptcy Judge Eugene R. Wedoff has served in the Northern District of Illinois in Chicago for 17 years, and he also served as Chief Bankruptcy Judge from 2002 through 2007. Judge Wedoff's recent publications include "Means Testing in the New § 707(b)," 79 Am. Bankr. L.J. 231 (2005), and he is the author

of the chapter on professional employment in Queenan, Hendel and Hillinger's "Chapter 11 Theory and Practice" (LRP Publications, 1994). Judge Wedoff is a frequent lecturer, having presented papers on a variety of consumer and business issues, and as a featured guest at multiple NACTT functions. In 1995, Judge Wedoff received the Excellence in Education Award from the National Conference of Bankruptcy Judges. Judge Wedoff drafted the model Chapter 13 plan currently used in the Northern District of Illinois.

Trustee Matters

No More Myths – Who Gets Paid After a Case is Converted or Dismissed

On March 31, 2011, at the Chapter 13 Liaison Committee Meeting, Judge Wedoff clarified and answered questions regarding Chapter 13 Attorney Fees after conversion or dismissal. (Please read the cover article written by Judge Wedoff on Chapter 13 Attorney Fees after Conversion or Dismissal.) This clarification was extremely important as we continue to move to convert from our CaseNET case administration software to the new BSS-TNG case administration software. The close codes in TNG, which control the status of the case, have been set to pay according to whether the case was dismissed or converted pre-confirmation or post-confirmation. Although we will not convert to TNG until the summer, we are working diligently each day to complete the conversion. Moreover, our current system had to be reviewed to make sure the Trustee was disbursing the funds properly. The Trustee disburses funds to creditors every third Friday of each month. Refunds to debtors are processed every fourth Friday of the month, except in November and December when debtor refunds are processed on the second Friday of the month.

If a case is dismissed or converted pre-confirmation, money in the case at the time of the dismissal or conversion will be disbursed to adequate protection secured creditors and to the debtor attorney. The debtor attorney must file an application for fees, the model retention agreement (Debtor Attorneys must read Amended General Order No. 11-02 effective April 22, 2011), and the Trustee must have an attorney fee order entered by the Judge on or before the date of dismissal or conversion. If money is received after the case is dismissed or converted pre-confirmation, the Trustee will return the money to the debtor.

If a case is dismissed or converted post-confirmation, money in the case at the time of the dismissal or conversion will be disbursed according to the confirmed plan. The date of the confirmation order helps us to determine which plan was confirmed. After the post confirmation review process (PCR) is completed, which is an audit prior to making the first disbursement, the disbursements will be made according to Section F of the Model Plan, unless Section G instructs otherwise. If the box for special provisions is not checked at the

beginning of the plan, the Trustee will assume that there are no provisions deviating from the model plan.

I reviewed the programming in our old system to make sure it was consistent with the settings and parameters in the new system. Once a case was dismissed or converted, the status was changed from active to inactive. Payments were made based upon the active or inactive status of the case. Effective April 1, 2011, the current system has been programmed to pay according to whether the case was dismissed or converted pre-confirmation or post-confirmation as explained above for the new system. Here is a table to help you determine who will be paid on a dismissed or converted case.



Dismissed – Converted: Who do you pay?

Use this table to determine who the Trustee pays when a case is dismissed or converted.

IF the case is...	And the confirmation date is...	THEN pay...
Dismissed or converted	Blank (case is Un-confirmed)	<ul style="list-style-type: none"> Adequate protection claims Attorney fees
Dismissed or converted	NOT blank (case is confirmed)	According to the plan: <ul style="list-style-type: none"> Current mortgage payments Secured creditors/Set payments Attorney fees Mortgage arrears \$507 priority creditors Special class unsecured Unsecured creditors

Marilyn O. Marshall, Standing Trustee



Money Tip

It makes sense to be saving money, but is it the best thing to do if you have high interest debt? Wouldn't it be better to pay that debt off first?

Well, the truth is, you should do both. An emergency fund is essential to keep from going further into debt if you run into trouble. Keep this fund at a reasonable amount, between \$1,000 and \$5,000, depending on your income. After that, use any excess funds to pay down your debt. Once your debt is gone, you can start saving more.

Financial**Why Does The Trustee Do A Mid-Case Audit?**

People are always asking “Why does the Trustee do a mid-case audit?”

To answer this question, we need first to understand that we are actually performing an audit at the mid-point of the case or after 100% claims have been paid in full. Some plans are for 36 months and others are for 60 months. Therefore, we do an audit at 18 months or at 30 months. It is at this point of the case that creditor disbursements to Administrative, Secured, and Priority creditors have all been paid. We refer to these as 100% creditor claims. By doing an audit right after the 100% creditors have been paid, we can attest to the accuracy that secured, administrative, and priority claims as loaded in CaseNET are paid correctly. The unsecured claims that are downloaded from the Clerk’s office to our office must also be audited before they can be paid. Unsecured creditors are not paid until we are certain that a mid-case audit has been performed.

The mid-case audit could actually fall sooner than the 18 month or 30 month period as mentioned above, because CaseNET keeps track of when all 100% creditors have been paid. Then, if money is in the case, it will put the case in the queue automatically for the Mid-Case Audit Job. The two most crucial requirements are that the bar dates have passed for both unsecured creditors and governmental entities, and that all 100% creditors – Secured, Priority and Administrative – are paid in full.

We run an audit job which produces an audit sheet for each case that meets the requirement of the mid-case audit. On this audit sheet all the information pertinent to that case from our system is shown so that the auditor can verify the information against the claims register on the court’s website.

The audit is performed using the court website rather than relying on our data in our system. The court holds the official record of claims and docket entries, so we will be verifying the data live via the court site to attempt to catch anything that may have been missed. A list of items is checked: Case number, case name, judge, law firm representing debtor. We make sure the bar dates match those of the court. All claims are verified by looking at the pdf and opening supporting documents to make sure the debt belongs to the debtor. We

match the name, redacted social security number, account numbers, verify that the dollar amounts match and that the claim was timely filed. We look at the plan to make sure that we have loaded the correct plan that has been confirmed by the Judge in the case. We work through all the different parts of the plan from D-1 plan payments to verify the pot. We then look at the plan for current mortgages in E2, moving to other secured creditors in E3, which would be a car, or furniture secured by a loan. We then move to E4 to check the amount the attorney stated he will receive, then check E5 for any mortgage arrears the debtor may have had. Then we look at E6 for priority claims, E7 for any special class claims, moving on to E8 for the percentage dividend to unsecured creditors and E9 for interest that may be required to pay to unsecured creditors. The final section we review is the section called Section G or special provisions. Section G is where you will find any provisions that override the general provisions of the plan or add special provisions as long as the box is checked at the beginning of the plan.

Finally, we will review all orders entered in court to verify that we have adhered to the Judges’ decisions. For example, has the stay been modified for a mortgage or a car? Has the mortgage been reinstated? Are we paying the mortgage, or is it still turned off?

Has a claim been disallowed after the case has started? Were there any modifications to the plan by an order which changes the pot, percentage to unsecureds, removes interest, changes the plan payment, etc? By reviewing all these different scenarios which affect the case, we can attest to the accuracy of the information we have in our system. In some circumstances, we find that an amended order will increase the arrears on a mortgage, so we will need to continue to pay 100% creditors. Another good example is IRS amended their original claim increasing the priority portion. Other examples would be claims adopted by a debtor through the court, claims missed from the court site which need to be loaded into our system.

Once we have completed this audit, we will stamp the case with the audit date allowing funds to flow to unsecured creditors. No funds will flow to unsecured creditors until we have completed the mid-case audit and verified that no additions to the 100% claims have occurred. Remember, the Trustee must pay according to the plan, and unsecured creditors must wait to be paid after 100% claims have been paid.

Mark Caffarini, Closing Specialist



Legal**Paralegal Responsibilities: Court Call Preparation**

Paralegals have the primary responsibility for case management during the confirmation process, including, but not limited to, the preparation for, and conducting of § 341 meetings, court call preparation and docketing, and post-confirmation review. Because I recently provided training to one of our new employees on the process of preparation and docketing of the court call and I have been exposed to the distinctions in the processes, I thought that would be a good topic for this month's article.

Although it may appear that, as paralegals for the Office of the Chapter 13 Trustee, we have identical duties and responsibilities, and the court call preparation process should at least, in theory, be consistent, in actuality, it is not. As most of you know, paralegals in our office are assigned to a particular Judge and, as such, we process all the documentation that we receive from court, attorneys, or clients that concerns that specific Judge's court call. When we contact attorneys who interact with our office, we always stress the importance of addressing emails to our office with a correctly formatted subject line. That way, their email can be properly directed to the paralegal assigned to the case.

Also, because we "work for" a given Judge, we need to make sure our procedures comply with the requirements and requests of that Judge. As far as processing of the emails is concerned, the procedures are almost the same: we read the email, docket it accordingly in our office system, image it if necessary, and notify the staff attorney in our office.

As a general rule, we try to prepare a court call a week in advance to give ample time for the staff attorney to review it. We make sure that we are aware of all the motions that will be heard on a given date, and we prepare tracking sheets for the staff attorney to make notes on and to take to court. We also prepare the confirmation packets that include the attorney review sheet that was prepared in anticipation of the § 341 meeting in addition to all the other documents that were provided to our office for a given case. The confirmation tracking sheets are printed on blue paper. You will hear us announcing that we are placing "blue paper" in the printer, so that you aware that we are in the process of printing blue tracking sheets for the cases that are up for confirmation. Once the blue sheets have been printed, we insert the necessary information about the case from CaseNET; we note whether there are any objections to plan confirmation filed by the creditors; whether there are motions for the cost of collection that were filed; whether a motion for attorney fees has been filed; and eventually, whether the Trustee has filed a motion to dismiss the case for unreasonable delay.

We also note whether we have received all of the required documents for the case. In a perfect world we would have all

of them by this time, instead of receiving them a day or two before the confirmation hearing. Once we finish that initial review, we are able to provide the staff attorney with the packets for review before the confirmation hearing.

From this point, the process of court call preparation differs from Judge to Judge. During the week before the confirmation hearing we receive numerous amended documents, and we notify the staff attorney of the changes. Some of our staff attorneys prefer to receive information about these changes through their email (sometimes we send a list of all the cases that had amendments at once, other times we forward email by email). Other staff attorneys would rather be notified by

marking changes on the packets – but that's only if they have already reviewed the packets. We either write the new date on the packet and turn it sideways, or add a yellow "sticky" note – again it's a matter of staff attorney's preference.

As the week before confirmation continues, we may be notified of changes in the court call, because "stuff" gets moved around, the time that motions will be heard may be changed, etc. These changes need to be communicated to our staff attorneys.

Additionally, our actual communication with the Judges' clerks differs from court call to court call:

★ Judge Hollis' Court Call: The paralegal sends blank copies of confirmation orders a week in advance. The date of the confirmed plan is added during the confirmation hearings. On Friday, before Monday's confirmation hearings, an email containing the list of cases recommended for confirmation is sent. The list is divided into four categories. First, the recommended cases, which have only one original plan filed. The second category is for cases that are recommended because an amended plan was filed. Thirdly, the list contains cases that will be continued. And fourthly, we indicate cases that have already been converted, dismissed or transferred. If any amendments are filed during the weekend, or on Monday morning, we just notify our staff attorney of these changes.

★ Judge Squires' Court Call: We do not send an email containing the list of the cases that will be recommended for confirmation. However, the paralegal responsible for this court call sends confirmation orders filled in with the date of the last amended plan that was filed along with Plan Confirmation Denied orders for each case. If there are amendments filed with the court in the meantime, then the paralegal notifies the staff attorney of the changes but does not need to prepare the new confirmation order; the Judge would just change the dates on the orders that were previously prepared.

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**FAILURE
IT'S NOT AN OPTION
WHEN YOU'RE
A PARALEGAL**

Case Administration**How To Beat The Summer Break Challenge**

As the school year draws to a close, there is a sort of relief for parents because you do not have to get kids up for school in the morning, make breakfast, take them to school, pick them up from school and help with homework. On the flip side, there is a feeling of anxiety because you find yourself asking "What are the kids going to do all summer, and how much is it going to cost?" Parents that have more than one elementary age child could run into childcare that breaks the pocketbook.

According to financial guru, Dave Ramsey, there are several things that you can do to insure that your child/children have a safe and enjoyable summer break that will be affordable to you yet fun for them.

1. **Parent Network:** Try to find other parents that work opposite shifts from you. This way you can take turns watching each other's kids and it will be free. The parents will be relieved because you have a responsible adult person watching your child and then your child will have a summer buddy.
2. **Summer Camp/Day Camp:** I know that summer camp or day camp would be the ideal place to put your child for the summer, but they can be quite costly. According to Dave Ramsey, there are many camps that offer discounts and scholarships. The Chicago Park District offered scholarships for summer camp this year based on family income.
3. **Churches and Volunteer Organizations:** According to Dave Ramsey, churches and community organizations are a great place to send your kids. Places like the YMCA and Boys and Girls Clubs would be great places to enroll your child or have an older child volunteer to help out around the organization.

4. **Flexible Schedules:** You might be able to talk to your boss about having a flexible schedule for the summer. Perhaps you can work from home or work extra hours to have one full day off each week. There are some employers that offer these options to their staff.
5. Above all, Dave Ramsey wants you to choose a safe and comfortable setting for your child this summer. He recommends to check the following before you make a child care decision:
 - Ask about the care provider's insurance and whether your family insurance will have to cover any medical expenses, if necessary.
 - Find out how long the program or camp has been in operation. How many children return each year? Check references from parents who have used the program.
 - Find out how many adults will be on hand to supervise the activities. What training have they had?
 - If possible, spend some time observing how the program, camp or childcare provider works.

While these ideas are cost effective, don't let cost be your only guide. Find things that your child/children will enjoy as well. If you find a good resource, be sure to sign up early for the following summer because sometimes you can receive a really good discount, especially if you have multiple children.

Have a great summer and be safe!

Elise A. Taylor, Case Administrator

**By the Numbers:
Older Americans**

- ★ There are almost 40 million people aged 65 and older in the United States.
- ★ About 6.5 million older Americans are still in the workforce.
- ★ The median income of households with people aged 65 and older is \$31,354.
- ★ Over 66 percent of citizens 65 and older live with relatives. Only 27 percent live alone.
- ★ Among those aged 65 and older, there are 74 men for every 100 women. For those aged 85 and older, it drops to 46 men per 100 women.



Source: U.S. Census Bureau

May's Notable Events

May is **Older Americans Month**.

Happy Birthday to Maude Tetteh on May 1st!

Law Day U.S.A. on May 1st.

Happy Birthday to Rita Saunders on May 2nd!

All Staff Meeting on May 6th.

Mother's Day on May 8th.

Happy Birthday to Anthony Olivadoti on May 13th!

Happy 24th Anniversary to Sandra Pillar on May 18th!

National Waitstaff Day on May 21st.

Happy 16th Anniversary to Anthony Olivadoti on May 22nd!

Memorial Day on May 30th (the office will be closed).



Legal Paralegal Responsibilities: Court Call Preparation

(Continued from page 5.)

**FAILURE
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★ Judge Goldgar's Court Call: The list of the cases recommended for confirmation is emailed the day before the confirmation hearings. Contrary to the email that is sent for Judge Hollis' Court call, here the list consists of only recommended cases and we do not split the list to let the court know whether there was an amended plan filed or not. Also, what is very different from any other court call, is that we do not send any confirmation orders to court at that time. Instead, once the staff attorney comes back from court, we are notified which cases were confirmed that day, then we prepare confirmation orders containing the date of the plan that was actually confirmed. If we were requesting tax refunds to be added to the pot and the Judge agreed, we would also prepare the appropriate order. Once orders are ready, our administrative clerk takes them over to the court for the Judge to sign.

★ Judge Wedoff's Court Call: For this court call we also notify the Judge's clerk of the cases that we are recommending for confirmation. Here, instead of emailing the list, the paralegal will call the clerk and tell him which cases the staff attorney is recommending. The Judge signs the confirmation orders at the bench, so we need to make sure our staff attorney can hand up the order containing the appropriate date of the plan that is being confirmed. In order to do so, the paralegal, at the end of the day preceding the court call, will go through all of the cases and make sure all the confirmation orders have the correct date on them. If any amendments are filed after we leave the office, on the morning of the court call we will prepare a new confirmation order with the proper date on it.

As you can see, there are subtle differences in each court call preparation and the handling of it. It is not rocket science by any means, but adjusting to these changes takes a bit of time. We want to comply with what we are expected to do and we want to do it exceptionally. As paralegals, we cover for each other when someone is either sick or on vacation, so it is really important for all of us to know the procedures for each court call and to be flexible so there are no delays or misunderstandings. Our work is not independent – we represent the Office of the Chapter 13 Trustee and, as such, communicate with court, debtor's attorneys, creditors' attorneys and the debtors themselves – so we need to make sure our work complies with the requirements of the third parties. Thus, as Ms. Marshall always says, quoting Thomas Fuller: "Good is not good, where better is expected." We want to be better at what we do than is expected.

Paulina Garga-Chmiel, Paralegal

Information Services Crystal Reports: Can You Relate?

How do the reports and jobs you run in CaseNET relate to the reports you will create in TNG? Are you wondering how you are going to get the same tasks accomplished in the new system?



I've been creating reports for TNG using Crystal Reports. It's an application used to design and generate reports from the TNG database.

Part of the learning process for me has been where to find the data. I'm so familiar with the structure of the CaseNET database and have been trying to get up to speed to be as familiar with the data in TNG. For example, claims in CaseNET are payees in TNG, and OK to allocate set to False in CaseNET is a "No Check" code in TNG.

You will be mapping your CaseNET tasks to TNG tasks as well. The letter templates in CaseNET are pre-set forms that allow you to create a "custom" report with links to the database. In TNG, I have created Crystal Reports that serve the same purpose.

Instead of clicking on the "Letter Template" icon in CaseNET, you can create your letters from the My Tasks section of your home page, or perhaps the reports section of the Case page in TNG.

I'm currently working with Rita on completing the letters and reports for the Financial area. We are walking the fine line of trying to re-create what we have in CaseNET, while making sure we are utilizing all the new capabilities in TNG. We can't just duplicate the existing reports, we have to understand the entire process so that the creation of the report makes sense. Each report has to be approved by Ms. Marshall before it can be uploaded to TNG and she always stresses "What is the purpose of this report?" and "Why is this information on the report?"

One of that last stretches to completing the reports for the Financial area includes how to close the case. This is forcing the conversion team to re-examine the close codes we set up in TNG and making sure the cases will behave the way we expect them to, by paying out the proper creditors and/or the debtor's attorney and debtor at the appropriate time.

After the Financial reports are done, I will move on to the Claims area. Working on those reports and letters will seem like a breeze!

Sandra Pillar, Director of Office Systems

Trivia Quiz: Smile

May is National Smile Month. It's said that your smile is your best asset. Test your smile knowledge with this trivia quiz.



1. True or False: All snakes have teeth.
2. How many teeth will an average shark grow during its lifetime?
3. Before there were dentists, what profession was responsible for curing aching teeth?
4. The first patent for chewing gum was granted to Dr. William F. Semple, a dentist, in what year?
5. The first dental chair was designed in 1790 by the first native-born dentist of which country?
6. In 1937 toothbrushes began to be manufactured with what material?

7. In World War II American Army soldiers were for the first time ordered to do what to their teeth?
8. How many types of toothbrushes have been patented to-date worldwide?
9. True or false: Animals rarely get cavities.
10. How many miles of dental floss do Americans purchase each year?



The Answers:

- | | |
|-------------|----------------------------|
| 1. True. | 6. Nylon for the bristles. |
| 2. 20,000. | 7. Brush them. |
| 3. Barbers. | 8. Over 3,000. |
| 4. 1869. | 9. True. |
| 5. America. | 10. Over 3 million miles. |

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Did You Know: Unusual Words

- "Underground" is the only word in the English language that begins and ends with the letters "und."
- The combination "ough" can be pronounced in nine different ways. The following sentence contains them all: "A rough-coated, dough-faced, thoughtful ploughman strode through the streets of Scarborough; after falling into a slough, he coughed and hiccoughed."
- "Redivider" is the longest common palindromic word (a word reading the same backwards and forwards).



- "I am" is the shortest complete sentence in the English language.
- Of all the words in the English language, the word "set" has the most definitions.
- "Dreamt" is the only word in the English language that ends in the letters "mt."
- The dot over the letter "i" is called a tittle.
- The only 15 letter word that can be spelled without repeating a letter is "uncopyrightable."
- There is no English word that rhymes with orange.

