

# **BANKRUPTCY <sup>UP</sup>DATE**

## **February 21, 2023**

If someone else would like to receive these <sup>UP</sup>dates, please send an e-mail to [Shan\\_Stroup@sdb.uscourts.gov](mailto:Shan_Stroup@sdb.uscourts.gov).

### **Certificates of Service**

Please clearly set forth in your Certificates of Service how service was actually made. Do **not** list every possible way service can be made or state service was made "in the manner provided by law." Pursuant to Bankr. D.S.D. R. 9004-3(d), a Certificate of Service "shall conform to [Appendix 9D](#) and shall not include the names and addresses of parties who will be served electronically by the Clerk" and "shall, whenever possible, be filed as an attachment to the document served."

### **Link**

[Previous Bankruptcy <sup>UP</sup>dates](#)

As always, should you have questions regarding this <sup>UP</sup>date or anything else concerning your dealings with the Court or the Clerk's office, please let us know.