

IN THE UNITED STATES **BANKRUPTCY** COURT  
FOR THE *SOUTHERN* DISTRICT OF IOWA

In Re: )  
 )  
THOUSAND ADVENTURES, INC., ) CHAPTER 7  
 ) NO: 97-03618  
 )  
Debtor. )

**APPLICATION OF ELDERKIN & PIRNIE P.L.C.  
FOR FOURTH INTERIM ORDER APPROVING ATTORNEYS' FEES AND EXPENSES**

Elderkin & Pirnie P.L.C. ("Elderkin"), through the undersigned counsel respectfully states:

1. Dan Childers and Elderkin & Pirnie P.L.C. are duly appointed attorneys for the Trustee in the above captioned case.

2. Total fees and expenses charged by Elderkin & Pirnie, P.L.C. for the period covered by this application (October 29, 2001 to April 30, 2003) are \$77,203.12. An itemization of the fees and expenses charged is attached hereto, marked as Exhibit A, and incorporated by reference herein.

3. The undersigned represents that all of the fees and expenses contained in this application were reasonable and necessary to accomplish the tasks requested by the Trustee for the benefit of the estate. None of the fees or expenses contained in this application have previously been requested, allowed or paid. Attached hereto and marked as Exhibit "B" is a list of all attorneys or paralegals who provided services during the period covered by this application, along with the hourly rates charged.

WHEREFORE, the Trustee respectfully requests that the Court, after appropriate Notice, enter an Order approving the fees and expenses for Elderkin & Pirnie, P.L.C. and authorize the Trustee to pay the same from available funds. The Trustee requests such other or alternative relief as is appropriate under the circumstances.

ELDERKIN & PIRNIE, P.L.C.

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Dan Childers                      404746700  
115 First Avenue SE  
P.O. Box 1968  
Cedar Rapids, IA 52406-1968  
Phone:(319) 366-2137  
Fax: (319) 362-1640

ATTORNEY FOR TRUSTEE

**EXHIBIT "B"**

**DAN CHILDERS**

Born Bowling Green, Kentucky, March 25, 1954; B.A. cum laude in philosophy from Western Kentucky University, 1976; J.D. University of Iowa 1982; Admitted to bar: Iowa and U.S. District Court for the Northern District of Iowa 1982, U.S. District Court, Southern District of Iowa 1984. Member Linn County, Iowa State, and American bar Associations, and American Bankruptcy Institute; certified in Business Bankruptcy by the American Board of Certification.

2001	DC	Dan Childers	Attorney	\$175.00
2002	DC	Dan Childers	Attorney	\$185.00
2003	DC	Dan Childers	Attorney	\$195.00

**ANN M. KLOSTERMANN MCCREA**

Born Dubuque, Iowa, October 29, 1968; admitted to bar, 1999, Iowa, U.S. Court of Appeals, Eighth Circuit and U.S. District Court, Northern and Southern Districts of Iowa. Education: University of Iowa (B.G.S., 1991); Mount Mercy College (B.S., 1996); William Mitchell College of Law (J.D., 1999). Member, Cedar Rapids Estate Planning Council; Linn County and Iowa State (Member: Probate and Trust Section; Young Lawyers Division; Executive Council; Trust Code Committee, YLD Services to Elderly Committee; YLD Membership Committee) Bar Associations.

2003	AMM	Ann McCrea	Attorney	\$135.00
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In Re: )  
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THOUSAND ADVENTURES, INC., ) CHAPTER 7  
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**MOTION TO LIMIT NOTICE OF APPLICATION  
OF ELDERKIN & PIRNIE P.L.C. FOR FOURTH INTERIM  
ORDER APPROVING ATTORNEYS' FEES AND EXPENSES**

Elderkin & Pirnie P.L.C, counsel for the Chapter 7 Trustee, respectfully requests this Court limit the notice of Elderkin & Pirnie's Application for Fourth Interim Approving Attorneys' Fees and Expenses to that provided to those entities on the "unofficial service list," and states:

1. Simultaneously herewith, Elderkin & Pirnie has filed an Application for Fourth Interim Order Approving Attorneys' Fees and Expenses (the "Application").
2. Under applicable rules, notice of an objection bar-date of the Application should be issued to all creditors and parties-in-interest.
3. The matrix in this case consists of roughly 50 pages, with each page comprising of approximately 27 names. In other words, a total of approximately 1,350 entities will have to be notified.
4. The costs of postage alone to notice 1,350 will be \$499.50 plus the staff time making the copies and stuffing the envelopes.
5. In light of the costs and burden of noticing 1,350 entities, notice of an objection bar-date relative to the Application should be limited only to those entities who have appeared via counsel and whose names and addresses are being used by the Chapter 7 Trustee and other parties in this case, more or less as an "unofficial service list." Additionally, the notice of the motion and bar-date for objections should be supplied to Mr. Dan Hooper, who has agreed to post such notices on a website for members pursuant to the Court's prior requests.

WHEREFORE, Elderkin & Pirnie P.L.C. respectfully requests that this Court enter an order authorizing it to issue notice of an objection bar-date for the Application to only those entities on the “unofficial service list, “ and to have such notice of objection bar-date posted upon the members website by Mr. Dan Hooper, and granting such further relief as this Court deems equitable and just.

ELDERKIN & PIRNIE, P.L.C.

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Phone: (319)366-2137  
Fax: (319) 362-1640

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Debtor. )

**NOTICE OF OBJECTION BAR DATE TO  
MOTION TO LIMIT NOTICE**

Notice is hereby given that on or about May 7, 2003, Elderkin & Pirnie P.L.C., attorneys for Eric W. Lam, the chapter 7 Trustee in the above-captioned case, filed: **Motion to Limit Notice of the Application of Elderkin & Pirnie P.L.C. for Fourth Interim Order Approving Attorneys' Fees and Expenses.** A copy of the Motion is attached to this Notice. The **Application of Elderkin & Pirnie P.L.C. for the Fourth Interim Order Approving Attorneys' Fees and Expenses** seeks allowance and payments of fees and out-of-pocket expenses in the amount of \$77,203.12 incurred by Elderkin & Pirnie through and including April 30, 2003.

Notice is further given that all objections to this **Motion to Limit Notice of the Application of Elderkin & Pirnie P.L.C. for Fourth Interim Order Approving Attorney's Fees and Expenses** must be filed on or before **May 27, 2003**. The objection must be filed with the Clerk of the Bankruptcy Court, Southern District of Iowa, P.O. Box 9264, Des Moines, Iowa 50306-9264 and simultaneously a service copy must be mailed to movant, Elderkin & Pirnie, P.L.C., 115 1<sup>st</sup> Avenue S.E., P.O. Box 1968, Cedar Rapids, Iowa 52406-1968, Attn: Dan Childers; and the U.S. Trustee, Suite 517, 210 Walnut Street, Des Moines, Iowa 50309-2108.

Notice is further given that timely-filed objections, if any, will be set for hearing by separate notice. If no objections are filed, the appropriate order will be entered.

ELDERKIN & PIRNIE, P.L.C.

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 ) NO: 97-03618  
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**NOTICE OF BAR DATE FOR OBJECTIONS TO  
APPLICATION OF ELDERKIN & PIRNIE P.L.C FOR FOURTH INTERIM ORDER  
APPROVING ATTORNEYS' FEES AND EXPENSES; AND NOTICE OF HEARING  
DATE FOR OBJECTIONS, (IF ANY)**

Notice is hereby given that on or about May 7, 2003, Elderkin & Pirnie, attorneys for Eric W. Lam, the Chapter 7 Trustee in the above-captioned case, filed: **Application of Elderkin & Pirnie P.L.C. for Fourth Interim Order Approving Attorneys' Fees and Expenses. The Application of Elderkin & Pirnie P.L.C. for Fourth Interim Order Approving Attorneys' Fees and Expenses** seeking allowance and payments of fees and expenses in the amount of \$77,203.12 incurred by Elderkin & Pirnie through and including April 30, 2003. A copy of the aforesaid application may be viewed at the office of the Clerk of the Bankruptcy Court as noted below or may be obtained by contacting the attorney for the Trustee at the address listed below.

Notice is further given any and all objections to the **Application of Elderkin & Pirnie P.L.C. for Fourth Interim Order Approving Attorneys' Fees and Expenses** must be filed on or before May 27, 2003. The objection must be filed with the Clerk of Bankruptcy Court, Southern District of Iowa, P.O. Box 9264, Des Moines, Iowa 50306-9264, and simultaneously a service copy must be mailed to: movant, Elderkin & Pirnie, 115 1<sup>st</sup> Avenue S.E., P. O. Box 1968, Cedar Rapids, Iowa 52406-1968, Attn: Dan Childers; and the U.S. Trustee, Suite 517, 210 Walnut Street, Des Moines, Iowa 50309-2108.

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