

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

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

**MOTION TO LIMIT NOTICE OF  
MOTION TO APPROVE EXPENSES FOR  
LEGAL COUNSEL SERVICES**

Elderkin & Pirmie P.L.C, counsel for the Chapter 7 Trustee, respectfully requests this Court limit the notice of Trustee's Motion To Approve Expenses for Legal Counsel that provided to those entities on the "unofficial service list," and states:

1) Simultaneously with the filing of this Motion, Trustee's counsel has filed a Motion to Approve Expenses for Legal Counsel Services in Dallas, Texas. Service on that Motion on all creditors and parties in interests in this case would be impractical or impossible. Even service upon all parties who have filed claims would entail substantial mailing expenses.

2) Previously, this Court has approved limiting Notice to the "unofficial short list" and by posting Notice on the Members Website maintained by Mr. Dan Hopper. Service of this Motion for approval of expenses of legal counsel services should be noticed in similar fashion.

WHEREFORE, the Trustee respectfully requests that the Court approve the limiting of Notice as set forth above, or for such other or alternative relief as the Court may deem just and equitable under the circumstances.

Respectfully submitted,

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Dan Childers 404746700  
ELDERKIN & PIRNIE, P.L.C.  
115 First Avenue SE  
P.O. Box 1968  
Cedar Rapids, IA 52406-1968  
Phone:(319)366-2137  
Fax: (319) 362-1640  
ATTORNEY FOR TRUSTEE

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In Re: )  
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THOUSAND ADVENTURES, INC., ) CHAPTER 7  
 ) NO: 97-03618  
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**NOTICE OF OBJECTION BAR DATE TO  
MOTION TO LIMIT NOTICE**

Notice is hereby given that on or about August 23, 2002, 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 Motion To Approve Expenses for Legal Counsel Services**. A copy of the Motion is attached to this Notice. A copy of this **Notice** has been served upon all creditors and parties of interest on the attached service list.

Notice is further given and all objections to this **Motion to Limit Notice of the Motion To Approve Expenses for Legal Counsel Services** must be filed on or before September 13, 2002. 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, Eric W. Lam, Trustee, P.O. Box 1943, Cedar Rapids, Iowa 52406-1943; 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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**NOTICE OF BAR DATE FOR OBJECTIONS TO  
MOTION TO APPROVE EXPENSES FOR LEGAL COUNSEL SERVICES**

Notice is hereby given that on or about August 23, 2002, Elderkin & Pirnie, attorneys for Eric W. Lam, the Chapter 7 Trustee in the above-captioned case, filed: **Motion To Approve Expenses for Legal Counsel Services**. A copy of the **Motion** is attached to this **Notice**. **The Motion to Approve Expenses for Legal Counsel Services** seeks approval to grant the Trustee the authority to pay to Mr. Weldon Moore the sum of \$3,666.62 as reasonable compensation for the expenses of providing legal services in the Dallas area and were necessary to the estate to allow the Trustee to go forward with efforts to sell the Red River Ranch property.

Notice is further given any and all objections to the **Motion To Approve Expenses for Legal Counsel Services** must be filed on or before September 13, 2002. 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, Eric W. Lam, Trustee, P. O. Box 1943, Cedar Rapids, Iowa 52406-1943; 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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