

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

IN THE MATTER OF:)	Case No. 97-03618-DJ
)	
THOUSAND ADVENTURES, INC.)	Chapter 7
)	
Debtor.)	

TRUSTEE'S MOTION TO APPROVE EXPENSES FOR LEGAL COUNSEL SERVICES

Eric W. Lam, Chapter 7 Trustee, through his undersigned counsel, for his Motion as above captioned respectfully states:

- 1) Burke Mordy and Mordy & Mordy P.C. are duly appointed special counsel for the estate.
- 2) Total fees and expenses charged by Mordy & Mordy P.C. for serves rendered is \$49,567.83. An itemization of the fees and expenses charged is attached hereto, marked as Exhibit A, and incorporated by reference herein. The undersigned represents that he has reviewed the attached itemization and believes that these charges are fair and reasonable for the legal services provided in the Oklahoma area and were necessary to the estate to allow the Trustee to go forward with efforts to sell the Red River Ranch property.

WHEREFORE, the Trustee respectfully requests that the Court, after appropriate Notice, enter an Order approving the fees and expenses for Mordy & Mordy P.C. The Trustee requests such other or alternative relief as is appropriate under the circumstances.

Respectfully submitted,

DAN CHILDERS 404746700
ELDERKIN & PIRNIE, P.L.C.
115 1st Ave. S.E., P.O. Box 1968
Cedar Rapids, IA 52406-1968
(Phone) (319) 362-2137
(Fax) (319) 362-1640
ATTORNEY FOR TRUSTEE

cc: U.S. Trustee
Attn: Mr. Jim Snyder
210 Walnut, Ste. 793
Des Moines, IA 50309-2108

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 Ardmore, Oklahoma. 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,

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 BAR DATE FOR OBJECTIONS TO
MOTION TO APPROVE EXPENSES FOR LEGAL COUNSEL SERVICES**

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: **Motion To Approve Expenses for Legal Counsel Services**. **The Motion to Approve Expenses for Legal Counsel Services** seeks approval of the fees of Mordy & Mordy in the amount of \$49,567.83 as reasonable compensation for providing legal services. A copy of the aforesaid Motion 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 addressed listed below.

Notice is further given any and all objections to the **Motion To Approve Expenses for Legal Counsel Services** 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 1st 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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ATTORNEY FOR TRUSTEE

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In Re:)
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**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 Motion To Approve Expenses for Legal Counsel Services**. A copy of the Motion is attached to this Notice.

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 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, Eric W. Lam, Trustee, P.O. Box 1943, Cedar Rapids, Iowa 52406-1943; Elderkin & Pirnie, P.L.C., 115 1st 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.

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