

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

In Re:)
) Chapter 7
THOUSAND ADVENTURES, INC.,)
) Bankruptcy No. 97-03618
Debtor.)

**MOTION TO LIMIT NOTICE
OF THIRD MOTION FOR ALLOWANCE AND PAYMENT
OF FEES INCURRED BY TRUSTEE'S TAX COUNSEL**

COMES NOW Eric W. Lam, Chapter 7 Trustee, and in support of this motion respectfully states:

1. Simultaneously herewith, the Trustee has filed a Third Motion for Allowance and Payment of Fees Incurred by Trustee's Tax Counsel.
2. Under applicable rules, notice of an objection bar date of the Third Motion for Allowance and Payment of Fees Incurred by Trustee's Tax Counsel should be issued to all creditors and parties-in-interest.
3. The matrix in this case consists of many pages, with each page comprising of approximately 27 names. A total of over one thousand entities will have to be noticed.
4. The Third Motion for Allowance and Payment of Fees Incurred by Trustee's Tax Counsel merely seeks an allowance and payment of expenses incurred in the preparation of the 2000 tax returns, in the amount of \$1,003.00.

5. The costs of postage alone to issue more than one thousand notices appear to be unreasonable, when compared to only \$1,003.00 of total fees and expenses being sought.

WHEREFORE, the trustee respectfully prays that this Court enter and enroll an order authorizing the Trustee to issue notice of an objection bar date relative to the Third Motion for Allowance and Payment of Fees Incurred by Trustee's Tax Counsel to only those entities on the "unofficial service list," and for such other relief as may be just and proper under the premises.

MOYER & BERGMAN, P.L.C.

//s//

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CHAPTER 7 TRUSTEE

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CERTIFICATE OF SERVICE

The undersigned hereby certifies, under penalty of perjury, that a copy of the instrument to which this certificate is attached was mailed via the United States mail with postage fully paid on the 5th day of February, 2002, to the parties displayed on the Service List appended hereto.

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