

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

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

**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. Via a previous order of this Court, the Willey Law Firm and Attorney Bruce Willey were appointed to serve as counsel for the Trustee, with the specific purpose of preparing tax returns for the estate.
2. The preparation efforts were extremely difficult, in that the debtor's records were either not available or incomplete.
3. Eventually, during the week of January 7, 2002, the tax returns for the 2000 tax year were prepared by the Willey Law Firm, and the Trustee signed and filed the returns January 14, 2002.
4. Attached to this motion is a fee invoice from the Willey Law Firm and attorney Willey showing services rendered and expenses incurred, and the Trustee has examined the fee invoice and has found it to be reasonable and necessary.

WHEREFORE, the Chapter 7 Trustee respectfully prays that this Court on such notice and hearing as it may direct, enter and enroll an order approving and allowing fees and expenses of \$1,003.00 to the Willey Law Firm, P.C., or as displayed on Exhibit "A" attached hereto, and further authorizing the Trustee to pay the allowed fees and expenses from available funds on hand, 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.

/s/