

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) Pursuant to the Court's prior Order, the Trustee has employed the services of Creel, Sussman & Moore L.L.P., attorneys and counselors at law in Dallas, Texas with regard to three bankruptcy cases pending in the Dallas area that were delaying actions that the Trustee had pending in Oklahoma with regard to the sale of the Red River Ranch property.

2) Through the diligent and timely efforts of attorney Weldon Moore, a principle in the firm of Creel, Sussman & Moore L.L.P., relief from the Automatic Stay was obtained in all three cases in a timely manner allowing the Trustee to go forward with actions regarding the Red River Ranch property.

3) Total fees and expenses charged by Creel, Sussman & Moore L.L.P. for these serves rendered is \$3,666.62. An itemization of the fees and expenses charged is attached hereto, marked as Exhibit A, and incorporated by reference herein. These services are fair and reasonable for the legal services provided 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.

WHEREFORE, the Trustee respectfully requests that the Court, after appropriate Notice, enter an Order approving the fees and expenses for Creel,

Sussman & Moore L.L.P. 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.

Respectfully submitted,

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cc: U.S. Trustee
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