

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

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

**APPLICATION OF ELDERKIN & PIRNIE P.L.C.
FOR THIRD INTERIM ORDER APPROVING ATTORNEYS' FEES AND EXPENSES**

Elderkin & Pirnie P.L.C. ("Elderkin"), pursuant to 11 U.S.C. section 331, hereby applies for an Order authorizing and directing the Debtor to pay Elderkin's attorneys' fees and expenses incurred in connection with this case. In support thereof Elderkin respectfully represents:

1. Elderkin is the attorney of records for the Trustee for Thousand Adventures, Inc. ("Trustee") in the above-named case, and has acted as such during all of the proceeding's to date.

2. Dan Childers is a member of the law firm who specializes in bankruptcy and reorganization cases and is recognized as a specialist. A brief professional biography of each of the persons in the firm performing services described in this application is attached as Exhibit "A"

3. Elderkin has expended time in the form of attorney services. This time has been itemized on records which reflect, on a day-to-day basis, the work performed by each member of the firm during the period covered by this application. Copies of the time records are attached as Exhibit "B". A list setting forth the letter designations, name, employment category, and normal hourly rate charges are attributable to each individual performing the services rendered herein, is attached as Exhibit "C".

EXHIBIT "A"

DAN CHILDERS

Born Bowling Green, Kentucky, March 25, 1954; B.A. cum laude in philosophy from Western Kentucky University, 1976; J.D. University of Iowa 1982; Admitted to bar: Iowa and U.S. District Court for the Northern District of Iowa 1982, U.S. District Court, Southern District of Iowa 1984. Member Linn County, Iowa State, and American bar Associations, and American Bankruptcy Institute; former law clerk to the Honorable William W. Thinnes, the late bankruptcy judge for the Northern District of Iowa.

EXHIBIT "C"

DC	Dan Childers	Attorney	\$170.00 - \$175.00
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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 APPLICATION
OF ELDERKIN & PIRNIE P.L.C. FOR THIRD INTERIM
ORDER APPROVING ATTORNEYS' FEES AND EXPENSES**

Elderkin & Pirnie P.L.C, counsel for the Chapter 7 Trustee, respectfully requests this Court limit the notice of Elderkin & Pirnie's Application for Third Interim Approving Attorneys' Fees and Expenses to that provided to those entities on the "unofficial service list," and states:

1. Simultaneously herewith, Elderkin & Pirnie has filed an Application for Third Interim Order Approving Attorneys' Fees and Expenses (the "Application").
2. Under applicable rules, notice of an objection bar-date of the Application should be issued to all creditors and parties-in-interest.
3. The matrix in this case consists of roughly 50 pages, with each page comprising of approximately 27 names. In other words, a total of approximately 1,350 entities will have to be notified.
4. The costs of postage alone to notice 1,350 will be \$459.00 plus the staff time making the copies and stuffing the envelopes.
5. In light of the costs and burden of noticing 1,350 entities, notice of an objection bar-date relative to the Application should be limited only to those entities who have appeared via counsel and whose names and addresses are being used by the Chapter 7 Trustee and other parties in this case, more or less as an "unofficial service list." Additionally, the notice of the motion and bar-date for objections should be supplied

to Mr. Dan Hooper, who has agreed to post such notices on a website for members pursuant to the Court's prior requests.

WHEREFORE, Elderkin & Pirnie P.L.C. respectfully requests that this Court enter an order authorizing it to issue notice of an objection bar-date for the Application to only those entities on the "unofficial service list," and to have such notice of objection bar-date posted upon the members website by Mr. Dan Hooper, and granting such further relief as this Court deems equitable and just.

ELDERKIN & PIRNIE, P.L.C.

Dan Childers 404746700
115 First Avenue SE
P.O. Box 1968
Cedar Rapids, IA 52406-1968
Phone:(319)366-2137
Fax: (319) 362-1640

ATTORNEY FOR TRUSTEE

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

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

ORDER GRANTING MOTION TO LIMIT NOTICE

The matter before the court is the Motion of Elderkin & Pirnie P.L.C. to Limit Notice of Application for Attorney’s Fees. Having examined the Motion, the Court finds that good cause exists to grant the relief requested in the Motion. Notice of an Objection Bar Date relative to the Application of Elderkin & Pirnie P.L.C. for the Third Interim Order Approving Attorneys’ Fees and Expenses should be issued only to those entities and parties-in-interest who have appeared via counsel and who have requested notice, all of which entities and names and addresses have been used by the Trustee as an “unofficial service list”, together with posting of Notice on the “members” website maintained by Dr. Dan Hopper.

LEE M. JACKWIG
UNITED STATES BANKRUPTCY JUDGE

Order Prepared and submitted by:
Dan Childers 404746700
Elderkin & Pirnie, P.L.C.
115 First Avenue SE; P.O. Box 1968
Cedar Rapids, IA 52406-1968

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

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 November 6, 2001, 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 Application of Elderkin & Pirnie P.L.C. for Third Interim Order Approving Attorneys' Fees and Expenses**. A copy of the Motion is attached to this Notice. The **Application of Elderkin & Pirnie P.L.C. for the Third Interim Order Approving Attorneys' Fees and Expenses** seeks allowance and payments of fees and out-of-pocket expenses in the amount of \$104,572.43 incurred by Elderkin & Pirnie through and including October 29, 2001. 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 Application of Elderkin & Pirnie P.L.C. for Third Interim Order Approving Attorney's Fees and Expenses** must be filed on or before **November 26, 2001**. 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: Eric W. Lam, P.O. Box 1943, Cedar Rapids, Iowa 52406-1943; movant, 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.

ELDERKIN & PIRNIE, P.L.C.

Dan Childers 404746700
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
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**NOTICE OF BAR DATE FOR OBJECTIONS TO
APPLICATION OF ELDERKIN & PIRNIE P.L.C FOR THIRD INTERIM ORDER
APPROVING ATTORNEYS' FEES AND EXPENSES; AND NOTICE OF HEARING
DATE FOR OBJECTIONS, (IF ANY)**

Notice is hereby given that on or about November 6, 2001, Elderkin & Pirnie, attorneys for Eric W. Lam, the Chapter 7 Trustee in the above-captioned case, filed: **Application of Elderkin & Pirnie P.L.C. for Third Interim Order Approving Attorneys' Fees and Expenses**. A copy of the **Application** is attached to this **Notice**. The **Application of Elderkin & Pirnie P.L.C. for Third Interim Order Approving Attorneys' Fees and Expenses** seeks allowance and payments of fees and expenses in the amount of \$104,572.43. incurred by Elderkin & Pirnie through and included October 29, 2001.

Notice is further given any and all objections to the **Application of Elderkin & Pirnie P.L.C. for Third Interim Order Approving Attorneys' Fees and Expenses** must be filed on or November 26, 2001. 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: Eric W. Lam, P. O. Box 1943, Cedar Rapids, Iowa 52406-1943; 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 heard on December 6, 2001 at 3:30 p.m. in the Bankruptcy Court room of Chief Bankruptcy Judge Lee M. Jackwig, fourth floor United States Courthouse Annex, 110 East Court, Des Moines IA 50309. In no objections are filed the appropriate order will be entered.

Dan Childers 404746700
115 First Avenue SE
P.O. Box 1968
Cedar Rapids, IA 52406-1968
Phone:(319)366-2137
Fax: (319) 362-1640

ATTORNEY FOR TRUSTEE

IN THE UNITED STATES **BANKRUPTCY** COURT
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In Re:)
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ORDER

The matter before the court is the Application for Elderkin & Pirnie P.L.C. for Third Interim Order Approving Attorneys' Fees and Expenses. Due and proper notice of an objection bar date relative to the motion was given to the requisite parties-in-interest. The objection bar date has passed, and no one has filed an objection.

IT IS THEREFORE ORDERED, that the relief requested in the Application of Elderkin & Pirnie P.L.C. for Third Interim Order Approving Attorneys' Fees and Expenses is granted and Elderkin & Pirnie is hereby allowed fees of \$_____, and the trustee is authorized to pay the interim amount from available funds on hand. All expenses will be subject to eventual final approval by this Court, upon further notice and hearing as this Court may direct.

LEE M. JACKWIG
UNITED STATES BANKRUPTCY JUDGE

Order Prepared and submitted by:
Dan Childers 404746700
Elderkin & Pirnie, P.L.C.
115 First Avenue SE; P.O. Box 1968
Cedar Rapids, IA 52406-1968

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ORDER

The matter before the court is the Application of Elderkin & Pirnie P.L.C. for Third Interim Order Approving Attorneys' Fees and Expenses. Having examined the Motion, the Court finds that good cause exists to grant the relief requested in the Motion. Notice of an Objection Bar Date relative to the Application of Elderkin & Pirnie P.L.C. for the Third Interim Order Approving Attorneys' Fees and Expenses should be issued only to those entities and parties-in-interest who have appeared via counsel and who have requested notice, all of which entities and names and addresses have been used by the Trustee was an "unofficial service list."

LEE M. JACKWIG
UNITED STATES BANKRUPTCY JUDGE

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