

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.

 //s//

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Cedar Rapids, IA 52406-1968
Phone:(319)366-2137
Fax: (319) 362-1640

ATTORNEY FOR TRUSTEE

Dan Hopper, Chairman
TAI Members Committee
4740 Silver Oak Street
Dayton OH 45424-4650

Princeton Capital Finance Co. (2002 list)
c/o Rosanne Thomas Matzat
350 Fifth Avenue, Suite 3700
New York NY 10118

North Carolina Attorney General (2002 list)
Consumer Protection Section
c/o Harriet F. Worley
PO Box 629
Raleigh NC 27602-0629

Douglas County Bank & Trust (2002 list)
c/o Thomas O. Ashby
Baird, Holm Law Firm
1500 Woodmen Tower
Omaha NE 68102

Missouri Attorney General (2002 list)
c/o Anne Schneider
PO Box 899
Jefferson City MO 65102

Liberty Bank (2002 list)
c/o G. Mark Rice
317 Sixth Avenue, Suite 620
Des Moines IA 50309-4115

Heritage Finance Company dba (2002 list)
Cascade Finance
c/o Thomas L. Fiegen
PO Box 2849
Cedar Rapids IA 52406-2849

James W. Boyd, Chapter 7 Trustee (2002 list)
Western District of Michigan
c/o Michael I. Conlon
326 East State Street
PO Box 686
Traverse City MI 49685-0686

Iowa Department of Revenue & Finance (2002 list)
c/o John Waters
Collection Section, 3rd Floor
PO Box 10457
Des Moines IA 50306

Eric W. Lam
Moyer & Bergman

Donald F. Neiman
801 Grand Avenue, Suite 3700
Des Moines IA 50309-2727

Douglas County Bank & Trust (2002 list)
c/o John J. Jolly, Jr.
1500 Woodmen Tower
Omaha NE 68102

Office of Attorney General (2002 list)
Kristy L. Hiebert
301 SW 10th Street
Topeka KS 66612-1597

Heller Financial, Inc. (2002 list)
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West Des Moines IA 50266

Oppenheimer, Wolff & Donnelly (2002 list)
c/o Shannon M. O'Toole
45 South Seventh Street, Suite 34
Minneapolis MN 55402

Allstate Financial Corp (2002 list)
c/o Gary A. Norton
317 Sixth Avenue, Suite 1200
Des Moines IA 50309

Douglas Enterprises, Inc. (2002 list)
c/o Thomas H. Burke
317 Sixth Avenue, Suite 1200
Des Moines IA 50309

Mortgage Express, Inc. (2002 list)
c/o John D. Feller
213 Farm Credit Building
206 South 19th Street
Omaha NE 68102

900 Capital Services, Inc. (2002 list)
c/o Stela A. Havkin
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Woodland Hills CA 91367

James Snyder
Assistant US Trustee

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Chicago IL 60611-3514

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c/o Jeanne C. Schuller
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2nd Floor, 425 Fifth Avenue North
Nashville TN 37243-0489

AM Express Travel Related Services (2002 list)
c/o Becket & Lee LLP
PO Box 3001, Dept AC
Malvern PA 19355-0701

Advanta Business Services Corp (2002 list)
c/o Lis Fleischer
1020 Laurel Oak Road
PO Box 1228
Voorhees NJ 08043-1228

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Daytona Beach FL 32119

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PO Box 1968
Cedar Rapids IA 52406-1968

Internal Revenue Service
SPS Stop 5400 DSM
210 Walnut Street
Des Moines IA 50309-2109

Missouri Department of Revenue (2002 list)
c/o Steven A. Ginther
301 West High Street, room 670
PO Box 479
Jefferson City MO 65105-0475

Stanley & Beth Vanden Berg (2002 list)
Torgerson & Vanden Berg Law
200 North Adams
Mason City IA 50401

Iowa Department of Justice (2002 list)
Benjamin E. Bellus
Consumer Protection Division
Hoover State Office Building
Des Moines IA 50319

James Doll (2002 list)
c/o Bert Edwards
119 South 7th Street
Louisville KY 40202

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 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.

_____/s/_____
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Fax: (319) 362-1640

ATTORNEY FOR TRUSTEE