

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

IN THE MATTER OF:)	Chapter 7 Bankruptcy
)	Case Number: 97-03618 DJ
THOUSAND ADVENTURES, INC.,)	
)	
<u>Debtor.</u>)	
ERIC W. LAM, exclusively in his capacity)	
as Trustee of the bankruptcy of:)	Adversary No. 99-99160
THOUSAND ADVENTURES, INC.,)	
Plaintiff,)	
)	
vs Alliant Communications, Inc.)	
)	
Defendant)	

MOTION FOR PAYMENT OF ATTORNEY FEES

COMES NOW the Plaintiff in the above-captioned adversary and hereby moves that this Court approve the payment Plaintiff's attorney in this action, stating to the Court the following:

1. A default judgment was rendered against the Defendant, Alliant Communications, Inc. on January 26, 2001 in the amount of \$5,927.70. The Defendant has paid the default judgment with post petition accrued interest of \$401.68 thru May 12, 2004 by tendering its check in the amount of \$6,329.38.
2. Defendant has already tendered to Plaintiff the sum of \$6,329.38, in full payment of the judgment.
3. On the 16th day of March, 1999, the undersigned was authorized to pursue preference actions on behalf of the Trustee.
4. The terms of that engagement provided that at this point of the litigation, the undersigned would receive one-third of the proceeds, plus out-of-pocket expenses. The out of pocket expenses will be applied for in the case in chief.
5. Counsel for the Plaintiff is entitled to one-third of the proceeds received, which is \$2,109.79.

WHEREFORE, Plaintiff respectfully requests that this Court enter an order directing the Trustee to forthwith pay the undersigned attorney fees equal to one-third of the recovery, \$2,109.79, and grant such other and further relief as the Court deems just and equitable, given the circumstances.

Dated this 20th day of May, 2004.

/s/ Joseph A. Peiffer
Joseph A. Peiffer IS9999471
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ATTORNEY FOR CHAPTER 7 TRUSTEE

CERTIFICATE OF SERVICE

I hereby certify that a copy of the document on which this appears and all enclosures, was mailed the date indicated below, to the parties in interest listed below as required by the Bankruptcy Rules by Day Rettig Peiffer, P.C.; it was also transmitted to Dan Hopper, Chairman of the Thousand Adventures, Inc. Members Committee for posting on the National Association of Members web site. In addition, this Notice was mailed to the parties listed on attached Exhibit B, which are the same parties listed in the Motion to Limit Notice filed in Bankruptcy Case #97-03618DJ on December 1, 1999 as amended on January 12, 2000.

Dated: May 20, 2004.

Signed: Joseph A. Peiffer

Dan Hopper, Chairman
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