

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF ARKANSAS

RE: _____
Debtors

CASE NO: _____
Chapter 13

MOTION REQUESTING ALLOWANCE
OF ADMINISTRATIVE CLAIMS

COMES now _____, attorney for the Debtors, and for his Motion for Allowance of Administrative Claim states as follows:

1. That this is a Chapter 13 matter filed with this Court on _____.
2. That this Court has approved an attorney's fee application and costs in the amount of \$3000.00 and an additional \$_____, for a total of \$_____.
3. That Movant's approved compensation should be deemed an administrative expense under 11 U.S.C. Section 330(a) and should be paid from funds available by the Chapter 13 Trustee to Movant pursuant to 11 U.S.C. 503(a) prior to any refund being disbursed to the Debtors.

WHEREFORE, the Movant, _____, prays that the Court enter an Order allowing the Movant's claim for compensation as an administrative claim and further directing the Chapter 13 Trustee to pay said claim in full prior to any disbursement or refund to the Debtors.

Respectfully submitted,

ATTORNEYS FOR DEBTORS

BY: _____

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF ARKANSAS

RE: _____
Debtors

CASE NO: _____
Chapter 13

NOTICE OF OPPORTUNITY TO RESPOND

NOTICE IS HEREBY GIVEN that the Debtor filed a Motion for Administrative Expenses, a copy of which is attached hereto.

All creditors and interested parties are HEREBY NOTIFIED to file a written response to the Motion for Administrative Expenses within twenty-one (21) days from the date of this notice with the Clerk of the Court at 300 West 2nd Street, Little Rock, AR 72201.

FAILURE TO FILE A WRITTEN RESPONSE TO THE ATTACHED MOTION SHALL BE DEEMED A STATEMENT OF NO OPPOSITION TO THE MOTION, AND THE COURT MAY ENTER, WITHOUT FURTHER NOTICE, AN ORDER GRANTING THE RELIEF REQUESTED.

IF NO RESPONSE IS TIMELY FILED, COUNSEL FOR THE MOVING PARTY SHALL SUBMIT A PRECEDENT GRANTING THE RELIEF SOUGHT AT THE EXPIRATION OF SAID TWENTY-ONE (21) DAYS.

If a response opposing the Motion is timely filed, a hearing on same will be set by subsequent notice.

Dated this _____ day of _____ 2014.

Respectfully submitted,

ATTORNEYS FOR DEBTORS

BY: _____

CERTIFICATE OF SERVICE

I, _____, do hereby certify that a copy of the foregoing Notice of Opportunity to Respond has been forwarded to all interested parties whose names and addresses are set forth below, on this _____ day of _____, 2014.

(Debtors)

All Creditors

Electronically to:

Jack W. Gooding, Trustee
P. O. Box 8202
Little Rock, AR 72221