

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

IN RE:)
)
PAUL R. DULBERG) No. 14-83578
)
)
Debtor.) Judge Thomas M. Lynch

NOTICE OF MOTION TO EMPLOY ATTORNEYS FOR THE TRUSTEE

Megan G. Heeg has filed papers with the Court to employ Megan G. Heeg and the law firm of Ehrmann Gehlbach Badger Lee & Considine, LLC as attorneys for the trustee. A copy of said Motion referred to herein is available for inspection at the offices of the Clerk of the U.S. Bankruptcy Court or at the offices of Ehrmann Gehlbach Badger Lee & Considine, LLC during usual business hours.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the Motion and want the Court to consider your views on said Motion, then you or your attorney must:

1. File a written response to the above Motion on or before the date set for the hearing on the Motion at the United States Bankruptcy Court, 327 South Church Street, Rockford, IL 61101; OR,
2. Attend the hearing scheduled to be held on May 27, 2015, at 9:30 a.m. at the United States Bankruptcy Court, Courtroom 3100, 327 South Church Street, Rockford, IL 61101.


If you mail your response to the Court for filing, you must mail it early enough so that the Court will receive it on or before the date stated above.

You must also mail a copy to: Attorney Megan G. Heeg
Ehrmann Gehlbach Badger Lee & Considine, LLC
215 E. First Street
P.O. Box 447
Dixon, IL 61021

If you file a response, attend the hearing on the Motion, scheduled to be held on May 27, 2015, at 9:30 a.m. at the United States Bankruptcy Court, Courtroom 3100, 327 South Church Street, Rockford, IL 61101.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the Motion and grant the same.

Dated: May 20, 2015

/s/ Megan G. Heeg 
Attorney Megan G. Heeg
Ehrmann Gehlbach Badger Lee & Considine, LLC
215 E. First Street
P.O. Box 447
Dixon, IL 61021

STATE OF ILLINOIS)
) SS. **PROOF OF SERVICE**
COUNTY OF LEE)

The undersigned, being first duly sworn on oath, deposes and says that she served the within document upon:

Paul R. Dulberg
4606 Hayden Court
McHenry, IL 60051-7918

VIA ECF Filing
Carole Ryczek, Esq.
United States Trustee's Office
780 Regent Street
Suite 304
Madison, WI 53715

VIA ECF Filing
David L. Stretch, Esq.
Law Office of David L. Stretch
5447 W. Bull Valley Road
McHenry, IL 60050-7410

by placing a true and correct copy of said document in an envelope, each addressed as is shown above. (Except for the documents to the U.S. Trustee's office and Debtors' attorney, which should have been served electronically by the Bankruptcy Court).

That she sealed said envelopes and placed sufficient U.S. postage on each; that she deposited said envelopes so sealed and stamped in the United States Mail at Dixon, Illinois, at or about the hour of 5:00 o'clock P.M. on the 20th day of May, 2015.

/s/ Katherine M. Elliott

Megan G. Heeg
Ehrmann Gehlbach Badger Lee & Considine, LLC
215 E. First Street, Suite 100
P.O. Box 447
Dixon, IL 61021
(815) 288-4949
(815) 288-3068 (FAX)
heeg@egblc.com

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UNITED STATE BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
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IN RE:)
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PAUL R. DULBERG) No. 14-83578
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Debtor.) Judge Thomas M. Lynch

MOTION TO EMPLOY ATTORNEYS FOR THE TRUSTEE

NOW COMES Megan G. Heeg, Trustee, and for her Motion to Employ Attorneys pursuant to Section 327 of the United States Bankruptcy Code, states as follows:


1. Movant is the duly qualified and acting Trustee in this case.
2. To perform her duties as Trustee, Movant requires the services of attorneys for the following purposes:
 - a. To advise and consult with Movant concerning questions arising in the conduct of the administration of the estate and concerning Movant's rights and remedies with regard to Debtors' interest in any estate assets and the claims of secured, preferred and unsecured creditors and other parties in interest;
 - b. To appear for, prosecute, defend and represent Movant's interest in suits arising in, or related to this case;
 - c. To assist in the preparation of such pleadings, motions, notices and orders as are required for the orderly administration of this estate; and
 - d. To take such legal action as is necessary to collect the assets of the Estate.
3. For the foregoing and all other necessary and proper purposes, Movant petitions the Court for authorization to employ generally the law firm of Ehrmann Gehlbach Badger Lee & Considine, LLC as attorneys to represent the Trustee.
4. Because the firm practices in bankruptcy matters and because of its experience in these fields, Movant believes that the firm is qualified to render the foregoing services.
5. That Ehrmann Gehlbach Badger Lee & Considine, LLC has no connections with

the Debtor, creditors, or any party in interest, respective attorneys and accountants, the U.S. Trustee, or any person employed in the office of the U.S. Trustee, except as follows:

- A. The trustee, Megan G. Heeg, is an attorney in the law firm of Ehrmann Gehlbach Badger Lee & Considine, LLC;
- B. Megan G. Heeg is a member of the panel of interim trustees which service cases filed in the Northern District of Illinois, Western Division.

6. Movant is informed that the normal hourly rates of said law firm is \$275.00 per hour for Megan G. Heeg. It is contemplated that the firm will seek compensation based on its normal and usual hourly billing rates, subject to approval by the Court.

WHEREFORE, Movant prays that she be authorized to employ the law firm of Ehrmann Gehlbach Badger Lee & Considine, LLC generally, and Megan G. Heeg, in particular, as her attorneys, to render services in the areas described above with compensation to be paid as an administrative expense in such amounts as the Court may hereinafter determine and allow.

/s/ Megan G. Heeg 
Attorney Megan G. Heeg
Ehrmann Gehlbach Badger Lee & Considine, LLC
215 E. First Street
P.O. Box 447
Dixon, IL 61021

Megan G. Heeg
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