

[CASE HEADING]

EX PARTE APPLICATION FOR COMPENSATION

NOW INTO COURT comes \_\_\_\_\_, counsel for \_\_\_\_\_ the debtor(s) herein(“Counsel”), who with respect represents:

1.

On \_\_[filing date]\_\_\_\_\_, \_\_\_\_\_ (“Debtor(s)”) filed a voluntary petition for relief under Title 11, chapter 13 of the Bankruptcy Code.

2.

This Court has jurisdiction over the matters presented herein, which are core in nature, pursuant to 28 U.S.C. §1334, 28 U.S.C. §157(b)(2)(B) and 11 U.S.C. §329.

3.

On \_\_[confirmation date]\_\_\_\_\_, this Court confirmed Debtors’ plan of reorganization (“Plan”).

4.

Prior to the filing of this case, and confirmed under the terms of Debtors’ Plan, counsel agreed to represent Debtors in this case for a fee of \$\_\_\_\_\_. Debtors paid \$\_\_\_\_\_ in cash before the filing of their case, and \$\_\_\_\_\_ was to be paid under the terms of the Plan. To date Counsel has received \$\_\_\_\_\_ on this sum.

5.

Subsequent to the filing of this case, Counsel requested, and was granted additional fees:

Amount awarded	Date of Services	Description of Services Rendered
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1.

2.

Of these additional sums, \$\_\_\_\_\_ has been paid through the Plan and \$\_\_\_\_\_ directly by Debtors.

6.

Since the filing date, Debtors required further legal services. Counsel has provided these services and seeks approval for same. The services provided are generally described:

7.

Counsel expended \_\_\_\_ hours in the representation of Debtors in connection with these services. This time included \_\_\_\_\_[time in court, time spent negotiation with secured lenders, time in the preparation of an amended plan and schedules, etc.]\_\_\_\_\_. In addition, personnel in Counsel's office spent \_\_\_\_ hours assisting in this effort. Their efforts are generally described as \_\_\_\_\_.

8.

Counsel believes that additional fees are warranted in this case because \_\_\_\_\_ Debtors do/ do not object to the awarding of these fees.

9.

To date, \$\_\_\_\_\_ has been paid in administrative expenses, \_\_\_\_\_ in priority expenses, and \$\_\_\_\_\_ on unsecured claims. The payment of these fees will/ will not operate as a reduction in the amounts available to pay unsecured claims.

10.

Debtors propose to pay these additional fees if allowed \_\_\_\_\_[how]\_\_\_\_\_.

WHEREFORE, Counsel prays that after notice, but without the necessity of hearing, that this Application be deemed good and sufficient to establish cause for the awarding of additional fees to Counsel in this case.

Respectfully submitted,