

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 APPROVE ATTORNEYS FEES AND  
COSTS AS AN ADMINISTRATIVE CLAIM**

Megan G. Heeg has filed papers with the Court regarding her motion to approve attorney fees (of \$1,155.00) and costs (of \$76.10) as an administrative claim of the Bankruptcy Estate pursuant to 11 U.S.C. 330. 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 September 28, 2016, 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



Printed: 09/06/16 10:15 AM

## Creditor Mailing Matrix

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Case No.: 14-83578

Name	Address	City	State	Zip
ABN AMRO Mortgage Group				
Alexian Brothers Medical Group	PO Box 5588	Belfast	ME	04915-5500
Associated Neurology SC	1900 Hollister Drive Suite 250	Libertyville	IL	60048-5249
Bank of America	PO Box 851001	Dallas	TX	75285-1001
BANK OF AMERICA	PO BOX 982238	EL PASO	TX	79998-2238
Bank of America	PO Box 982235	El Paso	TX	79998
Cabelas Visa Center	World's Foremost Bank PO Box 82609	Lincoln	NE	68501-2609
Capital One Bank	Attn: General Correspondence PO Box 30285	Salt Lake City	UT	84130-0285
Capital One Bank (USA), N.A.	PO Box 6492	Carol Stream	IL	60197-6492
Capital One Bank (USA), N.A.	PO Box 71083	Charlotte	NC	28272-1083
David L. Stretch	Law Office of David L. Stretch 5447 West Bull Valley Road	McHenry	IL	60050-7410
Dr. Frank W. Sek	4606 W. Elm Street	McHenry	IL	60050-4015
Dynamic Hand Therapy & Rehab	498 S. US Highway 12 Suite C	Fox Lake	IL	60020-1908
Hand Surgery Associates, SC	Dr. Sagerman / Dr. Biafora 515 W. Algonquin Road	Arlington Heights	IL	60005-4405
Joseph D Olsen	Yalden Olsen & Willette 1318 E State Street	Rockford	IL	61104-2228
McHenry Radiologists & Imaging	PO Box 220	McHenry	IL	60051-0220
MidAmerica Hand to Shoulder Clinic	Dr. Talerico 75 Remittance Drive, Suite 6035	Chicago	IL	60675-6035
Moraine Emergency Physicians	PO Box 8759	Philadelphia	PA	19101-8759
Northern Illinois Medical Center	4201 Medical Center Drive	McHenry	IL	60050-8499
Northwest Community Hospital	25709 Network Place	Chicago	IL	60673-1257
Northwest Suburban Anesthesiologis	8163 Solutions Center	Chicago	IL	60677-8001
Oak Trust Credit Union	1 South 450 Summit Avenue	Oakbrook Terrace	IL	60181
OAK TRUST CREDIT UNION	12251 S ROUTE 59	PLAINFIELD	IL	60585-9189
Oak Trust Credit Union	444 N Eola Rd, Suite 101	Aurora	IL	60502-9620
Oak Trust Credit Union	1811 W. Diehl Road Suite 700	Naperville	IL	60563
Open Advanced MRI of Round Lake	Medchex PO Box 502	Katonah	NY	10536-0502
Patrick S Layng	Office of the U.S. Trustee, Region 11 780 Regent St.	Madison	WI	53715-2635
Paul R Dulberg	4606 Hayden Court	McHenry	IL	60051-7918
U.S. Bankruptcy Court	Western Division	Rockford	IL	61101-1320

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## Creditor Mailing Matrix

Page: 2

Case No.: 14-83578

Name	Address	City	State	Zip
	327 South Church Street			
Walgreens	3925 W. Elm Street	McHenry	IL	60050-4361
Walmart Pharmacy	3801 Running Brook Farms Boulevard	Johnsburg	IL	60051-5425
WORLD'S FOREMOST BANK	CABELA'S CLUB VISA PO BOX 82609	LINCOLN	NE	68501-2609
Worlds Foremost Bank NA	4800 NW 1st Street Suite 300	Lincoln	NE	68521-4463

Total: 33

UNITED STATE BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

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

**MOTION TO APPROVE ATTORNEYS FEES AND COSTS  
AS AN ADMINISTRATIVE CLAIM**

NOW COMES Ehrmann Gehlbach Badger Lee & Considine, LLC, by Megan G. Heeg, counsel for the Bankruptcy Estate, and for its Motion to Approve Attorney Fees and Costs as an Administrative Claim, states as follows:

1. This Motion is filed pursuant to 11 U.S.C. §330 and Federal Bankruptcy Rule 2016.
2. Previously, Megan G. Heeg, had been the Chapter 7 case Trustee of the above-referenced case, but this case was recently assigned to a new trustee.
3. The employment of the law firm of Ehrmann Gehlbach Badger Lee & Considine, LLC was approved by the Court on May 27, 2015.
4. The only asset to be administered by the Estate is the Debtor's pre-bankruptcy cause of action entitled, *Paul Dulberg v. David Gagnon, Bill McGuire, and Caroline McGuire*, Case No. 12 LA 00178, pending in the 22<sup>nd</sup> Judicial Circuit, McHenry County, Illinois.
5. Since employment, the law firm has concentrated its efforts of preserving the Estate's interest in the pending litigation and, if beneficial to the Estate, retaining special counsel to represent the Estate in the pending litigation.
6. In addition, the Estate has also concentrated its efforts in researching the perfection of potential lien rights in the pending litigation.
7. Since Debtor filed his voluntary petition and up through the current date, the

Debtor has been represented by three separate lawyers and law firms, with each of the prior two law firms withdrawing from the case for reasons beyond the Bankruptcy Estate's control.

8. The time period covered by this application is from November 26, 2014 through September 28, 2016.

9. The hourly rate and the total requested is as shown on the itemized invoice attached hereto as Exhibit A.

10. Wherefore, movant prays that this court enter an order approving the work performed by the movant and her firm in previously representing the Bankruptcy Estate, in that amount of \$1,231.10, and that this amount be deemed an administrative claim under Sections 503(b) and 330 of the Bankruptcy Code.

WHEREFORE, movant requests this Court to approve the attorney fees and costs incurred by her law firm in the amounts listed above, and that the fees and costs been deemed an administrative expense of the Estate, and that this Court grant to movant such other and further relief as it deems just and proper.

/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  
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

***EHRMANN GEHLBACH BADGER LEE & CONSIDINE, LLC***

215 East First Street, Suite 100  
P.O. Box 447  
Dixon, Illinois 61021

Ph:815-288-4949

Fax:815-288-3068

Paul R. Dulberg  
c/o Joseph Olsen, Esq.  
1318 E. State Street  
Rockford, IL 61111

Sep 06, 2016

File #: 150343  
Inv #: Sample  
As of: Sep 28/16

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RE: Bankruptcy Asset Case

DATE	DESCRIPTION	HOURS	AMOUNT
May-19-15	Draft Motion to Employ law firm, Affidavit, Notice and proposed Order	0.60	165.00
May-21-15	Draft proposed Affidavit of Disinterest of Special Counsel	0.40	110.00
	Letter to Attorney Balke re: affidavit of disinterest and bankruptcy estate needs	0.30	82.50
	Email to Attorney Balke re: lien claim issues and short-term handling.	0.30	82.50
May-27-15	Court appearance Motion to Employ (discounted)	0.70	192.50
May-21-16	Research: lien perfection requirements	0.80	220.00
Sep-06-16	Draft Motion to Approve Attorney Fees and Costs	0.50	137.50
Sep-28-16	Court appearance on Motion for Approval of Fees (estimated)	0.60	165.00
	Totals	4.20	\$1,155.00

**Costs**

Copies (copy file for Trustee Olsen) 190x.20	38.00
Copies (Mt. to Approve 120x.20)	24.00
Postage (Mt. to Approve 30 x .47)	14.10

Totals	<hr/> \$76.10
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<b>Total Fees</b>	<hr/> <b>\$1,231.10</b>
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Previous Balance	\$0.00
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Previous Payments	\$0.00
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<b>Balance Due Now</b>	<hr/> <b>\$1,231.10</b>
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