

1 Leonard M. Shulman – Bar No. 126349
Melissa Davis Lowe – Bar No. 245521
2 **SHULMAN HODGES & BASTIAN LLP**
8105 Irvine Center Drive, Suite 600
3 Irvine, California 92618
Telephone: (949) 340-3400
4 Facsimile: (949) 340-3000
Email: lshulman@shbllp.com; mlowe@shbllp.com
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6 Proposed Attorneys for John M. Wolfe,
Chapter 7 Trustee
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8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA, SANTA ANA DIVISION**
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11 In re

Case No. 8:14-bk-14461-ES

12 **MURAD SHUQOM,**

Chapter 7

13 Debtor.

**CHAPTER 7 TRUSTEE’S APPLICATION TO
EMPLOY SHULMAN HODGES & BASTIAN
LLP AS GENERAL COUNSEL;
DECLARATION OF LEONARD M.
SHULMAN IN SUPPORT THEREOF**

[No Hearing Set Pursuant to Local Bankruptcy
Rule 2014-1(b)]

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18 **TO THE HONORABLE ERITHE A. SMITH, UNITED STATES BANKRUPTCY**
19 **JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE AND ALL INTERESTED**
20 **PARTIES:**

21 John M. Wolfe (“Trustee”), the duly appointed, qualified and acting Chapter 7 trustee for
22 the bankruptcy estate of Murad Shuqom (“Debtor”), will and hereby does bring this Application
23 to employ Shulman Hodges & Bastian LLP (the “Firm”), effective as of August 11, 2014, as his
24 general counsel in this bankruptcy case. In support thereof, the Trustee respectfully represents as
25 follows:

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1 **I. NEED FOR LEGAL COUNSEL**

2 On July 18, 2014 (“Petition Date”), the Debtor filed a voluntary petition under Chapter 7
3 of the Bankruptcy Code. The initial Section 341(a) Meeting of Creditors (“Meeting of
4 Creditors”) was held on August 12, 2014 and a continued Meeting of Creditors is currently
5 scheduled for September 18, 2014.

6 After conducting an initial investigation into this case, the Trustee has determined that
7 there is a need to retain counsel in this Chapter 7 case to advise the Trustee on various matters
8 affecting the recovery and liquidation of potential assets. For example, the Debtor’s Statement of
9 Financial Affairs (“SOFA”) reflect that the Debtor held an interest six corporations, one of which
10 is RBS Royalty Motorsports, Inc. (“RBS”), who, on July 18, 2014, also filed a voluntary petition
11 under Chapter 7 of the Bankruptcy Code. The Debtor is the President of RBS. The SOFA¹
12 reflects that during the 90 days prior to the Petition Date, the Debtor made payments to numerous
13 creditors totaling in excess of \$1 million dollars. In addition, the SOFA reflects that during the
14 year prior to the Petition Date, the Debtor closed six bank accounts; three of which were closed
15 within 90 days of the Petition Date.

16 Based on the foregoing, the Trustee needs the assistance of counsel to provide services
17 which will include, but will not be limited to, 1) investigate the Debtor’s ownership interest in
18 RBS and the other corporations to determine the true value and whether there is anything
19 available for liquidation for the benefit of the Estate and creditors; 2) investigate the financial
20 affairs of the Debtor; 3) investigate the Debtor’s interest in any assets of his non-debtor spouse, if
21 any; 4) investigate and analyze the transfers made to creditors within the 90 days prior to the
22 Petition Date to determine if any can be avoided pursuant to the Trustee’s avoiding powers under
23 the Bankruptcy Code; and 5) investigate potential discharge issues.

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28 ¹ It is interesting to note that other than Schedule B, the Debtor’s Bankruptcy Schedules and the SOFA
appear to be the same as those filed by RBS in its bankruptcy proceeding.

1 In order to assist the Trustee in the administration of the Chapter 7 case, the Trustee seeks
2 to employ the Firm as his general counsel at the Firm's hourly billing rates, which may be
3 subject to adjustment from time to time, plus costs. The Trustee believes that employment of the
4 Firm will be in the best interest of the Estate.

5 **II. PROPOSED EMPLOYMENT AND QUALIFICATIONS OF THE FIRM**

6 **A. Services to be Performed**

7 The Trustee seeks to employ the Firm as his general counsel to render, among others, the
8 following types of professional services:

- 9 • Consult with the Trustee concerning the administration of the bankruptcy case.
- 10 • Investigate the acts, conduct, assets, liabilities and financial condition of the
11 Debtor, and any other matters relevant to the case or the recovery of assets for the benefit of
12 creditors.
- 13 • Assist the Trustee in the liquidation of assets of the Estate including any assets
14 that may not have been scheduled by the Debtor, and the preparation of any documents and
15 pleadings necessary to sell and liquidate the assets, including negotiations with secured creditors
16 if needed, and bringing a motion for turnover if the Debtor fails to cooperate with the Trustee's
17 administration of assets of the Estate.
- 18 • Conduct examinations of witnesses, claimants, or adverse parties and to prepare
19 and assist in the preparation of reports, accounts and pleadings related to the Debtor's Chapter 7
20 case if necessary.
- 21 • Conduct investigations to determine if the Debtor has committed acts warranting
22 the commencement of an action to request the denial of the Debtor's discharge or revocation of
23 the Debtor's discharge.
- 24 • Investigate any and all claims and causes of action which constitute property of
25 the Estate, including but not limited to, the Estate's claims arising under any of Sections 542,
26 543, 544, 545, 546, 547, 548, 549 and 550 of the Bankruptcy Code, any actions based on
27 applicable nonbankruptcy law that may be incorporated or brought under the foregoing sections
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1 of the Bankruptcy Code, or any other similar action or proceeding filed to recover property for or
2 on behalf of the Estate or to avoid a lien or transfer (“Litigation Claims”).

3 • Prosecute any Litigation Claims lawsuit to a judgment in an appropriate trial
4 court.

5 • Analysis of possible settlement of Litigation Claims and conduct possible
6 settlement negotiations.

7 • If a judgment is obtained in favor of the Estate in any Litigation Claims lawsuit,
8 opposing any motion for new trial by any opposing party.

9 • Review of extraordinary claims filed against the Estate and, if necessary, bring
10 action to object to certain claims if there is sufficient cause. The Firm will review claims filed
11 against the Estate and, if necessary, bring actions to object to certain “legally sophisticated”
12 claims if there is sufficient cause; all other “routine” claims will be analyzed by the Trustee’s
13 administrator.

14 • Perform any and all other legal services incident and necessary herein to preserve
15 assets for the benefit of the Estate and its creditors.

16 The Trustee has not employed any other professionals in this case. However, in the event
17 additional professionals are employed, the services to be rendered by the Firm will not duplicate
18 the services rendered by any other professionals employed in the case.

19 **B. Qualifications of the Firm**

20 The Trustee believes that the Firm is well qualified to render the foregoing services. The
21 Firm is comprised of attorneys who are experienced in insolvency, bankruptcy and corporate
22 reorganization as well as the legal matters of the type that may need to be pursued herein. The
23 Firm has extensive experience in debtor/creditor matters, including the representation of trustees
24 that appear in bankruptcy cases. In summary, the members of the Firm have practiced in the
25 Bankruptcy Court for many years, and the Firm has handled virtually every type of matter that
26 can arise in the context of a bankruptcy case and is well able to perform the legal services
27 required in this case.

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1 All attorneys comprising or associated with the Firm who will appear in this case are duly
2 admitted to practice law in the courts of the State of California and in the United States District
3 Court for the Central District of California. A biography of each professional of the Firm, along
4 with the Firm's current hourly billing rates, which may be subject to adjustment from time to
5 time, is attached as **Exhibit "1"** to the Declaration of Leonard M. Shulman ("Shulman
6 Declaration") and incorporated herein by this reference. The Firm and each of the members,
7 associates, and paralegals who will work on this case are familiar with the Bankruptcy Code, the
8 Federal Rules of Bankruptcy Procedure, and the Local Bankruptcy Rules.

9 **III. THE FIRM IS "DISINTERESTED"**

10 Other than representing the Trustee in other non-related bankruptcy cases, to the best of
11 the Firm's knowledge, neither the Firm, nor any of the attorneys comprising or employed by it,
12 have a business, professional, or other connection with the Debtor, his creditors, any other party
13 in interest, their respective attorneys and accountants, the United States trustee, or any person
14 employed in the Office of the United States Trustee. To the best of the Firm's knowledge, none
15 of the attorneys comprising or employed by the Firm are related to any judge of the United States
16 Bankruptcy Court for the Central District of California, to the United States Trustee, or any
17 employee of the United States Trustee, except that Lynda T. Bui, who is a non-equity partner of
18 the Firm, is a member of the Chapter 7 Bankruptcy Trustee panel for the Central District of
19 California appointed and supervised by the Office of the United States Trustee.

20 The Firm is a "disinterested person" within the meaning of Bankruptcy Code Section
21 101(14) and represents no interest which would be adverse to the Debtor, the Estate, or any party
22 in interest in this proceeding. As of the Petition Date, the Firm was not a creditor of the Estate.

23 **IV. COMPENSATION OF THE FIRM**

24 The Firm has received no retainer for the services to be performed herein. There is no
25 oral or written employment agreement, except an agreement that the Firm will accept as
26 compensation such sum as the Court may deem reasonable, and the only source of payment will
27 be from property of the Estate as authorized by the Court.

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1 The Firm understands the provisions of Bankruptcy Code Sections 327, 330 and 331
2 which require, among other things, Court approval of the Trustee's employment of the Firm as
3 general counsel and of all legal fees and reimbursement of expenses that the Firm will receive
4 from the Debtor's Estate.

5 The Firm has agreed to be employed and compensated subject to the provisions of
6 Bankruptcy Code Section 330. In compliance with Sections 330 and 331 of the Bankruptcy
7 Code, the Firm intends to file applications for allowance of fees and reimbursement of costs as
8 and when appropriate. The Firm has not shared or agreed to share any compensation to be
9 received by it in this case with any other person, except as among partners of the Firm.

10 **WHEREFORE**, the Trustee requests that he be authorized to employ the Firm as his
11 general counsel in the Debtor's Chapter 7 case, effective as of August 11, 2014, at the Firm's
12 hourly rates plus costs, with any compensation and reimbursement of costs to be paid upon
13 further application and approval of this Court, and for such other and further relief as is just and
14 proper under the circumstances of this case.

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16 Dated: September 15, 2014



John M. Wolfe
Chapter 7 Trustee for the bankruptcy estate of
Murad Shuqom

DECLARATION OF LEONARD M. SHULMAN

I, Leonard M. Shulman, declare and state as follows:

1. The matters stated herein are true and correct and within my personal knowledge. If called as a witness, I could and would competently testify thereto. I am the managing partner of Shulman Hodges & Bastian LLP (the "Firm") and am authorized to and make this declaration on its behalf. I am admitted to practice before this Court.

2. I make this Declaration in support of the Chapter 7 Trustee's Application to Employ Shulman Hodges & Bastian LLP as General Counsel filed by John M. Wolfe ("Trustee"), the Chapter 7 trustee for the bankruptcy estate ("Estate") of In re Murad Shuqom ("Debtor"), Case No. 8:14-bk-14461-ES.

3. Attached hereto as **Exhibit "1"** and incorporated herein by reference is a brief biography of each of the professionals employed by the Firm along with the Firm's current hourly billing rates which may be subject to adjustment from time to time.

4. The Firm is comprised of attorneys who are experienced in insolvency, bankruptcy and corporate reorganization as well as litigation matters of the type that may need to be pursued herein. Furthermore, the Firm is experienced in debtor/creditor matters, including the representation of trustees that appear in bankruptcy cases. The members of the Firm have practiced in the Bankruptcy Court for many years, and the Firm has handled virtually every type of matter that can arise in the context of a bankruptcy case and is well able to perform the legal services required in this case.

5. All attorneys comprising or associated with the Firm who will appear in this case are duly admitted to practice law in the courts of the State of California and in the United States District Court for the Central District of California.

6. The members of the Firm are familiar with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules, and shall comply with them during the administration of this case.

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1 7. After a full investigation and therefore to the best of my knowledge, the Firm has
2 no business, professional, or other connection with the Debtor, his creditors, any other party in
3 interest, their respective attorneys and accountants, the United States trustee, or any person
4 employed in the Office of the United States Trustee, except Lynda T. Bui, a non-equity partner
5 of the Firm, is a member of the Chapter 7 Bankruptcy Trustee panel for the Central District of
6 California appointed and supervised by the Office of the United States Trustee.

7 8. Other than representing the Trustee in other non-related bankruptcy cases, and
8 after a full investigation, to the best of my knowledge, none of the attorneys comprising or
9 employed by the Firm are related to any judge of the United States Bankruptcy Court for the
10 Central District of California, the United States Trustee, or any person currently employed in the
11 Office of the United States Trustee.

12 9. After a full investigation and therefore to the best of my knowledge, the Firm is
13 both disinterested as that term is defined in Bankruptcy Code Section 101(14) and represents no
14 interest which would be adverse to the Debtor, this Estate or its creditors or any party in interest
15 in this proceeding.

16 10. The Firm has no pre-petition claim against the Debtor's Estate.

17 11. The Firm has received no retainer for the services to be performed during the
18 Chapter 7 case herein. There is no oral or written employment agreement, except an agreement
19 that the Firm will accept as compensation such sum as the Court may deem reasonable, and the
20 only source of payment will be from property of the Estate as authorized by the Court.

21 12. The Firm understands the provisions of Bankruptcy Code Sections 327, 330 and
22 331 which require, among other things, Court approval of the Trustee's employment of the Firm
23 as general counsel and of all legal fees and reimbursement of expenses that the Firm will receive
24 from the Debtor's Estate.

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1 13. The Firm has agreed to be employed and compensated subject to the provisions of
2 Bankruptcy Code Section 330. In compliance with Sections 330 and 331 of the Bankruptcy
3 Code, the Firm intends to file applications for allowance of fees and reimbursement of costs as
4 and when appropriate. The Firm has not shared or agreed to share any compensation to be
5 received by it in this case with any other person, except as among partners of the Firm.

6 I declare under penalty of perjury under the laws of the United States of America that the
7 foregoing is true and correct.

8 Executed on September 16, 2014, at Irvine, California.

9 /s/ Leonard M. Shulman

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Leonard M. Shulman

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EXHIBIT “1”
FIRM RESUME

SHULMAN HODGES & BASTIAN LLP

PARTNERS

SHULMAN, LEONARD M., born Los Angeles, California, June 1, 1961; Admitted to bar, 1986, California, U.S. District Court, Central, Eastern, Northern and Southern Districts of California. Education: University of California at San Diego (B.A. Magna Cum Laude, 1983); University of San Diego (J.D. 1986). Regent Scholar. Member: 1984-1986 and Comments Editor, 1985-1986, University of San Diego Law Review. Author: "Compensation for Collegiate Athletes: A Run for More Than Roses" 22 San Diego Law Review 701 (1986); Case Note, "Matter of Western Electronics, Inc.," 16 Cal. Bankr. J. 23 (Winter, 1988); Article, "Reasonable Reliance on a False Financial Statement," 17 Cal. Bankr. J. 225, 1989. Co-Author, Article "A Retrospect: 1989 Ninth Circuit Bankruptcy Decisions," Cal. Bankr. J. 1990. Author: Article, "Abatement of a Landlord's Rights under the Shopping Center Amendments: Section 365(d)(2) Does Not Mean What It Says," 18 Cal. Bankr. J. 851, 1990; "In re Mercado: Enjoining the Collection Efforts of a Holder of a Nondischargeable Claim," Norton Bankruptcy Law Advisor, October, 1991; "Armed and Dangerous: Continuation of a Receiver in Bankruptcy," Norton Bankruptcy Law Advisor, May 1992; "Is It Fair and Equitable to Alter the Bargained-for Exchange," The Bankruptcy Strategies, June 1992. "Supergeneric Descriptions of Debtor's Holdings Won't Do," Los Angeles Daily Journal, Business Law Section, August, 2005. "A Debtor's Right to Silence in a Bankruptcy Proceeding," Orange County Lawyer, September 2005; "Running On Empty: The Limitations Period On Installment Obligations," Orange County Business Journal, November 2006. Featured Speaker: "Pitfalls of Practice in Bankruptcy Court, Central District of California," December 1989, San Diego Bar Association; "How Reasonable Must Reliance Be on a False Financial Statement?" May 1990, Orange County Bar Association; "Bankruptcy in Today's Real Estate Market," February 1991, California Real Estate Investment Forum; "Automatic Stay -- Pitfalls of Practice," December 1991, Orange County Bar Association Creditors' Rights Section; "Automatic Stay -- Pitfalls of Practice," June 1992, Orange County Paralegal Association; "Representation of Creditors' Committees" (April 1993, Orange County Paralegal Association). Panelist: "Litigating Nondischargeability Actions" December 1990, Orange County Bankruptcy Forum; "Litigating Preference Actions," June 1991, Orange County bankruptcy Forum; "Handling a Chapter 11 Case," January 1992, Continuing Education of the Bar; "Bankruptcy Issues for the Real Estate Practitioner," June 1992, Orange County Bankruptcy Forum; "Bankruptcy Evidence I: Overcoming Evidentiary Roadblocks" (June 1992, Orange County Bankruptcy Program). "1994 Bankruptcy Reform Act" (November, 1994, Orange County Bankruptcy Forum); "Handling a Chapter 11 Reorganization The Right Way" (January 1994, CEB). "Small Business Chapter 11 Bankruptcies" (January 2008, Orange County Bankruptcy Forum); Moderator: "Employment of Professionals In Bankruptcy" (March 1994, Orange County Bar Association (Commercial Law and Bankruptcy Section); "What Price Justice: Is There an Exception to the Absolute Priority Rule?" January 1993, Orange County Bankruptcy Forum; "Law Practice Management for Bankruptcy Practitioners," April 1993, Orange County Bankruptcy Forum. Memberships: Member, Board of Directors, Orange County Bankruptcy Forum, 1991-1995 (Past President, 1995); California State Bar Association 1986 - Present. Member, Board of Directors, Pediatric Cancer Research Foundation (President 2006-2007).

HODGES, RONALD S., born Santa Monica, California, December 29, 1964; admitted to California Bar, 1990; admitted to Bar in District of Columbia, Court of Appeal, 1992; U.S. District Court, Central District of California, Northern District of California, 1996. Education: Loyola Marymount University (B.A. 1987); Loyola University School of Law (J.D. 1990). Recipient, American Jurisprudence Award: Trial Skills. Formerly: Judicial Extern to the Honorable Harvey A. Schneider, Superior Court of California, Los Angeles, 1989. Memberships: American Bar Association; California State Bar Association; Orange County Bar Association; Riverside County Bar Association; Defense Research Institute; Association of Southern California Defense Counsel.

BASTIAN, JAMES CHARLES, JR., born Chicago, Illinois, August 23, 1969; admitted to California Bar, 1994; U.S. District Court, Central District of California, 1994; Northern District of California, 1996; Eastern District of California, 1996; Southern District of California, 1998. Education: University of California, Los Angeles (B.A. 1991); Southwestern University School of Law (J.D. 1994). Formerly: Judicial Law Clerk and Extern to the Honorable Kathleen T. Lax, United States Bankruptcy Court, Central District of California, 1993-1995. Memberships: Orange County Bar Association (Commercial Law & Bankruptcy Sections); California State Bar Association; California Bankruptcy Forum, Board of Directors, 2000-2003; Orange County Bankruptcy Forum, President, 2000-2001, Vice President, 1999-2000, Board of Directors, 1997-2003, Co-Chair Special Projects Committee 1996-1997, Co-Chair Dinner Programs Committee 1997-1999.

PEMBERTON, GARY A., Gary A. Pemberton is a member of the firm's Litigation Department and is resident in the Foothill Ranch office. Mr. Pemberton specializes in business litigation and has handled breach of contract disputes, unfair competition, business torts, interference with contract, insurance litigation, real estate litigation, securities litigation, corporate director and officers litigation, public entity litigation, intellectual property litigation, bankruptcy litigation, probate litigation and environmental litigation. Mr. Pemberton has tried a number of cases to successful conclusions in federal and state courts in San Francisco, Orange, Riverside and San Diego counties. Mr. Pemberton is admitted to practice before the Ninth Circuit Court of Appeals, the Federal Circuit Court of Appeals, the United States District Courts of the Northern, Central and Southern Districts of California, and all courts of the State of California. Based on the recommendation of other attorneys in the Orange County legal community, the legal publication Martindale-Hubbel has awarded Mr. Pemberton an "AV" rating, denoting excellence both in legal practice and professional ethics. Mr. Pemberton graduated cum laude with a B.A. in History from the University of California, Los Angeles in 1977. While at UCLA, Mr. Pemberton was a member of the Alpha Tau Omega Fraternity and the Pi Gamma Mu National Social Science Honor Society. He also volunteered extensively with the Big Brothers Organization. Mr. Pemberton then matriculated to Princeton Theological Seminary where he obtained a M.Div. in 1981. He then served as a Presbyterian pastor for two years before entering law school at the University of California, Berkeley, where he earned his J.D. in 1986. While at the University of California, Berkeley, Mr. Pemberton was awarded a Moot Court Commendation of Excellence and a Major Walter Dinkelspiel Scholarship, was Fundraising Chairperson for the Berkeley Law Foundation and volunteered his time for the Legal Aid Society of Alameda County. Mr. Pemberton also served as a judicial extern to the Honorable Earl B. Gilliam, Jr., Judge of the United States District Court for the Southern District of California. Active in the professional community, Mr. Pemberton has spoken and presented continuing education seminars on various topics related to business litigation. Mr. Pemberton is currently a member of the Board of Directors of the Orange County Chapter of the Federal Bar Association and has served as the editor of its newsletter. Mr. Pemberton has also served on the Board of Directors of the YMCA of Newport Beach/Costa Mesa/Irvine and on the Board of Directors of the UCLA Club of Orange County. Mr. Pemberton is a member of the Business Litigation Section of the Orange County Bar Association. Mr. Pemberton is also active in the City of Irvine, where he resides, having coached Woodbridge High School to the Constitutional Rights Foundation Orange County Mock Trial Championship and served as Nation Chief of the YMCA Indian Princess Program in Irvine.

IGNATUK, J. RONALD, J. Ronald Ignatuk is a partner in the firm's litigation department and is resident in the Foothill Ranch office. Mr. Ignatuk's practice emphasizes insurance litigation, business litigation, real estate litigation, corporate officers and directors litigation, unfair trade practices litigation and bankruptcy litigation. Prior to joining the firm in 2000, Mr. Ignatuk was a partner of Barger & Wolen LLP. While at Barger & Wolen LLP, Mr. Ignatuk gained extensive experience representing numerous insurance carriers in high stakes bad faith litigation, and also prosecuted and defended numerous commercial, employment, unfair trade practices, real estate and unfair competition matters. Mr. Ignatuk has tried a number of cases to a successful conclusion. Mr. Ignatuk is admitted to practice before the Ninth Circuit Court of Appeals, United States District Court of Northern, Central, Eastern and Southern Districts of California, and all courts of the State of California. Mr. Ignatuk graduated with a B.A. in psychology from the Pennsylvania State University in 1986. Prior to entering Loyola Law School, Mr. Ignatuk taught high school both in Pennsylvania and in California. Mr. Ignatuk graduated from Loyola Law School, Order of the Coif, in 1990. Mr. Ignatuk also externed with the Santa Monica City Attorney's Office, where he acted as lead prosecutor in several criminal trials. Mr. Ignatuk is a member of the American Bar Association, Orange County Bar Association and California State Bar Association. Mr. Ignatuk is the president of his homeowner's association. He has done charity work, including volunteer charity work at his children's school and for Human Options, an organization dedicated to assisting battered women and their children.

PETERSEN, MICHAEL J., born Chicago, Illinois, February 12, 1952, admitted to the Wisconsin Bar 1977; Admitted to practice in Minnesota 1978, Admitted to practice in Illinois in 1982; Admitted to California Bar 1994. Education: University of Wisconsin, Stevens Point, Wisconsin (B.S. High Honors 1974); University of Minnesota School of Law, Minneapolis Minnesota (J.D. 1977 Cum Laude). Formerly: Assistant General Counsel, The Prudential Insurance Company of America, General Counsel Prudential Real Estate Affiliates, Inc., (1979-1999) General Counsel Newport Federal (Newport Beach California). Memberships: California Bar Association (member real estate section), Wisconsin Bar Association, Orange County Bar Association.

BRADSHAW, MARK, born Burbank, California, January 25, 1969; admitted to the California Bar, 1997; admitted to the U.S. District Court, all Districts of California. Education: University of California, Irvine (B.A. 1991); Whittier Law School (J.D. Summa Cum Laude, 1997). Recipient, American Jurisprudence Award: Bankruptcy; Community Property; Constitutional Law; Legal Skills; UCC II. Member, 1995-96, and Executive Editor, 1996-97, Whittier Law Review. Formerly: Law Clerk to the Honorable Ernest M. Robles, United States Bankruptcy Court, Central District of California, 1997-98; Judicial Extern to the Honorable John E. Ryan, United States Bankruptcy Court, Central District of California, 1996; Judicial Extern to the Honorable Kathleen T. Lax, United States Bankruptcy Court, Central District of California, 1995; Judicial Extern to the Honorable James

N. Barr, United States Bankruptcy Court, Central District of California, 1994. Author: The Role of Politics and Economics in Early American Bankruptcy Law 18 Whittier Law Review 739 (1997); New Local Bankruptcy Rules for the Central District of California: What you Need to Know 24 Cal. Bankr. J. 2 (1998). Memberships: Orange County Bar Association (Commercial Law & Bankruptcy Section); Orange County Bankruptcy Forum; California State Bar Association.

JENNINGS, JOHN MARK, born Denison, Texas, November 23, 1965; admitted to the California Bar, 1997; Admitted to the Supreme Court of the United States, U.S. Court of Appeals, Ninth Circuit, U.S. District Court (all Districts of California) and the U.S. Tax Court. Education: Baylor University, Waco, Texas (B.B.A., 1988); Whittier Law School (J.D. 1997). Member Law Review, Moot Court Honors Board, Recipient of Highest Honors in Civil Trial Advocacy, Lt. Governor American Bar Association, Law Student Division (Ethics). Formerly: Trial Clerk for the U.S. Tax Court, Washington, D.C., 1989-94; Extern to the U.S. Attorneys office; Extern to the Judge Advocate General Corps, United States Army Reserve; Staff Assistant to U.S. Department of Treasury and Bureau of Alcohol, Tobacco, and Firearms (Washington, D.C). Memberships: Federal Bar Association, Orange County Bar Association; Orange County Bankruptcy Forum; California State Bar Association; Robert A. Banyard, American Inns of Court; and Young Executives of America.

BUI, LYNDA T. admitted to the California bar 1999; admitted to United States District Court for the Central District of California; admitted to Ninth Circuit Court of Appeals. Education: University of California, Los Angeles (B.A. 1994); Loyola Law School (J.D. 1998). Formerly: Judicial Extern for the Honorable Kathleen P. March, United States Bankruptcy Judge, Central District of California, 1996 to 1998. Ms. Bui specializes in the area of bankruptcy law, but also practices civil litigation in state and federal court. Memberships: Los Angeles County Bar Association, Commercial Law and Bankruptcy Section; the Orange County Bankruptcy Forum; the Financial Lawyers Conference; active member of the Board of Governors for the Southern California Chinese Lawyers Association. Ms. Bui is a Chapter 7 Panel Trustee for the Central District of California, Riverside Division.

CONTRERAS, FRANKLIN J., born Miami, Florida, March 6, 1968, admitted to the California Bar, 2005; admitted to the U.S. District Court, Central District of California. Education: University of California at Irvine (B.A. 1992); Western State University College of Law (J.D. 1997). Member: Orange County Bankruptcy Forum.

HUTTENHOFF, ROBERT E., admitted to the California Bar, 2001; admitted to the U.S. District Court, Central District of California, 2001. Education: University of California, Santa Barbara (B.A. 1996); Whittier Law School (J.D. 2000). Recipient, American Bankruptcy Institute Medal of Excellence in Bankruptcy, 1999. Formerly: Law Clerk for the United States Bankruptcy Court, Central District of California 1999-2000; Judicial Extern to the Honorable John E. Ryan, United States Bankruptcy Court, Central District of California, 1999; Judicial Extern to the Honorable Lynne Riddle, United States Bankruptcy Court, Central District of California, 1998-1999. Memberships: Orange County Bar Association (Commercial Law & Bankruptcy Section); Orange County Bankruptcy Forum; California State Bar Association; California Young Lawyers Association. Featured Speaker: "Preference Actions in Bankruptcy" June 2003, Orange County Paralegal Association; "Bankruptcy 101", Sept 2003, Orange County Paralegal Association; Author: "What is the Sudden Impact of the Revised Bankruptcy Code on Business Reorganizations" Receivership News, Fall 2005.

ASSOCIATES

DILLION, HEATHER BRITTANY, born Torrance, California, September 13, 1985; admitted to the California Bar, 2013; admitted to the U.S. District Court, Central District of California, 2013. Education: University of Southern California (B.A., 2008); Loyola Law School, Los Angeles (J.D., 2013). During law school, Ms. Dillion was a member of the Scott Moot Court Honors Board where she competed as a finalist in the Scott Moot Court Competition and earned an award for Top Advocate in the National Moot Court Competition. She was also involved with the Youth Justice & Education Clinic where she represented juveniles, protecting their right to a meaningful, safe, and successful education. Memberships: Orange County Bar Association.

ESHAGHI, ELYZA P., is a member of the firm's Bankruptcy and Reorganization department and is a resident of the Riverside office. Admitted to the California Bar, 2013; admitted to the U.S. District Court, Central District of California, 2013. Education: University of California, Santa Barbara (B.A., 2008); Chapman University School of Law (J.D., 2013). While attending law school, Ms. Eshaghi was an executive board member of the Moot Court Honor Board. During Ms. Eshaghi's third year, she served as a judicial extern to the Honorable Erithe A. Smith (U.S. Bankruptcy Court, Central District of California). After graduating law school, Ms. Eshaghi worked pro bono for the Public Interest Law Center on the Debtor Assistance Project (DAP) and for the Legal Aid Society of Orange County.

GEBHART, KIARA, born San Clemente, California, June 21, 1983; admitted to the California Bar, 2008; admitted to the U.S. District Court, Central District of California, 2008. Education: University of San Diego, California (B.A., 2005); University of San Diego School of Law (J.D., 2008). Two time recipient of Honors in Legal Writing, recipient of Honors in Negotiation, and recipient of the American Jurisprudence Award for Bankruptcy. Formerly: Law Clerk at Shulman, Hodges & Bastian LLP, Foothill Ranch, California; Extern to the Alternate Public Defender, San Diego, California. Memberships: Orange County Bar Association; Federal Bar Association.

KIDO, RIKA M., born Tokyo, Japan, March 12, 1981; admitted to the California Bar, 2010; admitted to the U.S. District Court, Central District of California, 2010. Education: Middlebury College (B.A., 2003); University of California, San Diego (M.P.I.A., 2007); University of San Francisco School of Law (J.D., 2010). Recipient, CALI Excellence for the Future Award for highest grade in Legal Research & Writing I, Legal Research & Writing II, and International Business Transactions. Technical Editor, 2008, Assistant Literary Editor, 2008-2009, and Literary Editor, 2009-2010, USF Maritime Law Journal. Co-Author: "Operator, Can You Get Me an Extension? Extending the Automatic Stay to Non-Debtor Parties," 30 CAL. BANKR. J. 361 (2010).

LOWE, MELISSA DAVIS, Melissa is a member of the firm's Bankruptcy and Reorganization department and is a resident of the Irvine office. Ms. Lowe graduated magna cum laude from the Honors College at the University of Arizona with a B.S.B.A. in Finance in 2003. Ms. Lowe earned her J.D. in 2006 from Loyola Law School in Los Angeles and earned her Tax LL.M. from Loyola Law School in 2008. During law school, Ms. Lowe was a staff member of the Loyola Entertainment Law Review and a Scott Moot Court competitor and competed as a finalist in the American Bar Association Law Student Tax Challenge. She also held several leadership positions at the University of Arizona and at Loyola, including President of Phi Alpha Delta. Ms. Lowe is admitted to practice before the United States District Court for the Central, Southern, and Eastern District of California and all the courts of the State of California. Ms. Lowe is active in the community. She is a member of the Orange County Bankruptcy Forum, serving as its Secretary for 2011 and Vice President for 2012, and of the Orange County Bar Association, and is active in the Junior League of Orange County, California, as well as her church.

O'DEA, RYAN D., Ryan is a member of the firm's bankruptcy department and is a resident of the Irvine office. Ryan graduated from the University of California, Irvine with a B.A. in Criminology and Law in 2006 and placed on the dean's honor roll. Mr. O'Dea received his law degree from Chapman University School of Law *cum laude* in 2010. During law school, Mr. O'Dea was the Notes Editor of the Chapman Journal of Criminal Justice, wrote for the Chapman Law Courier. During Mr. O'Dea's third year of law school, he served two semesters as a judicial extern to the Honorable Erithe Smith (U.S. Bankruptcy Court, Central District of California). After graduating from law school, Mr. O'Dea volunteered with the Superior Court of California – Orange County as an intern research attorney, and a judicial intern to the Honorable Kazuharu Makino and the Honorable Richard Toohey (Superior Court of California – Orange County). After passing the California Bar in 2010, Mr. O'Dea was hired by the Honorable Meredith Jury to serve a judicial clerkship with the U.S. Bankruptcy Court, Central District of California. In doing so, Mr. O'Dea served as a judicial law clerk to the Honorable Meredith Jury, the Honorable Scott Clarkson, the Honorable Deborah Saltzman, the Honorable Catherine Bauer, and the Honorable Mark Wallace.

ROMERO, SAMUEL J., born Tucuman, Argentina, February 3, 1968; admitted to the California Bar, 2004; Education: Biola University (B.S., Physical Science, 1991); Chapman University School of Law (J.D. 2004). Recipient, CALI Excellence for the Future award for highest grade in Torts I, Civil Procedure I & II, Agency & Partnership, Corporations, Legal Research & Writing I, Corporations, International Business Transactions; highest grade Contracts I. Formerly: Judicial Extern to the Honorable Alex Kozinski, United States Ninth Circuit Court of Appeals, 2002-2003; Judicial Extern to the Honorable Kirk Nakamura, Superior Court of Orange County, California, 2002. Memberships: American Bar Association, Orange County Bar Association. Author: "Obesity Liability: A Super-Sized Problem or a Small Fry in the Inevitable Development of Product Liability?" 7 CHAP. L.REV. 239 (2004).

OCAMPO, PAUL S., born Manila, Philippines, March 14, 1970, admitted to the Washington Bar 1998; admitted to the California Bar 2003. Education: University of Washington (B.A. 1994); University of California, Hastings College of the Law (J.D. 1997). Formerly: Associate General Counsel, Getty Images, Inc. (1999-2001), Enforcement Attorney, Washington Securities Division (1998-1999). Memberships: Orange County Bar Association, American Bar Association (Business Section), Washington Bar Association.

COUNSEL TO THE FIRM

KURTZ, DONALD R., Mr. Kurtz brings over 25 years experience to Shulman Hodges & Bastian LLP in the areas of estate planning, trust administration, business organizations, transactions and complex tax matters. Mr. Kurtz was awarded his Bachelor's Degree in Business Administration from Walla Walla College, Washington in 1977. In 1980 he received the Doctor of Jurisprudence degree from the University of Oregon, and in 1984 received his Master of Law in Taxation from the University of San Diego School of Law. Mr. Kurtz was admitted to the Oregon Bar in September, 1980, and the California State Bar in May of 1981. He is currently a member of the Orange County Bar Association and is also admitted to practice before the U.S. Tax Court and the U.S. District Court for the Central District of California. Mr. Kurtz has been practicing law since September of 1980 and has been a resident of Orange County, California since August 1, 1980.

TAYLOR, A. LAVAR, Tax Counsel for Shulman Hodges & Bastian LLP, born Salt Lake City, Utah, November 11, 1957; admitted to District of Columbia 1981; California, U. S. District Court, Central District of California, United States Tax Court, Southern and Eastern Districts of California, U.S. Court of Appeals, Ninth Circuit, U.S. Supreme Court, 1987. Education: University of Illinois at Champaign, Illinois (B.A. Cum Laude, 1978); Georgetown University Law Center, Washington D.C. (J.D. Magna Cum Laude, 1981); Memberships: American Bar Association Tax Section; Orange County Bar Association; Orange County Bankruptcy Forum. Formerly: Assistant U. S. Attorney for Central District of California, Tax Division (1987 to 1989); Senior Trial Attorney, Internal Revenue Service, Laguna Niguel, California (1984-1986); and Attorney, Office of Chief Counsel, General Litigation Division, Internal Revenue Service, Washington, D.C. Currently a member of The Law Offices of A. Lavar Taylor.

PARAPROFESSIONALS

BRITTON, PATRICIA A., Education: Fullerton College, (A.A.); Paralegal Program, University of California at Irvine, Extension. American Bar Association Certification (Completion with honors); Certified Legal Assistant 1981; Bankruptcy Specialist, 1993. Author: "Thomson West's California Legal Filing Directory". Member: National Association of Legal Assistants; Orange County Paralegal Association.

CLAPP, LORRE, Education: California State University, Long Beach (B.A. 1978); Paralegal Program, University of California at Irvine, Extension. American Bar Association Certification (Completion 1985).

LITTLE, PAMELA G., Education: Chicago College of Commerce (1979); Paralegal Program, University of California at Irvine, Extension. American Bar Association Certification (Completion with Honors 1991). Member: Orange County Paralegal Association; National Notary Association.

LOHAYZA, ERLANNA L., Education: Paralegal Program, University of California at Irvine, Extension, American Bar Association Certification (Completion 1996); Member: Orange County Paralegal Association; National Notary Association. Formerly: Recording Secretary for Newport-Santa Ana Legal Secretaries Association (now known as NALS of Orange County), 2000-2002.

RODGERS, MELANIE A., Education: Paralegal Program, University of California at Irvine, Extension, American Bar Association Certification (Completion 1995); California State University at Long Beach (M.B.A 1989); California State Polytechnic University at San Luis Obispo, (B.S. 1985).

SWARTZELL, STEVEN P., Education: Fullerton College (A.S. 1993), Paralegal Certificate Program, Fullerton College, American Bar Association Certification (Completion 1993); Member: Orange County Paralegal Association; West Coast Association of Paralegals.

UDO, ARLAND, Education: University of Phoenix (B.S. 2000); Paralegal Program, University of California at Irvine, Extension, American Bar Association Certification (Completion 2007).

VERNON, ANNE MARIE, Education: Coastline Community College, Costa Mesa (A.A. 2004); Paralegal Program, Coastline Community College, American Bar Association Certification (Completion 2004). Member: Orange County Paralegal Association; Orange County Legal Secretaries Association.

WALSWORTH, TAMMY, Education: Chaffey Community College, (A.S. 1991); California State University, San Bernardino, (B.A. Criminal Justice, 1998); California State University, San Bernardino (B.A. Business Administration, 1998); Paralegal Program, California State University, San Bernardino, American Bar Association Certification (Completion 1997); Member: Orange County Paralegal Association; Bankruptcy Judicial Assistants Association.

WOOTEN, TONIA N. MANN, Experience: Fifteen years of experience as a bankruptcy and litigation paraprofessional working under the direct supervision of active members of the California State Bar and attorneys who practice in federal courts located in California. Attorney Attestation.

**2014
SHULMAN HODGES & BASTIAN LLP
SCHEDULE OF HOURLY RATES**

Attorneys:

Leonard M. Shulman	\$550
Ronald S. Hodges	\$550
James C. Bastian, Jr.	\$550
Mark Bradshaw	\$525
J. Ronald Ignatuk	\$525
John Mark Jennings	\$525
Gary A. Pemberton	\$525
Michael J. Petersen	\$525
Lynda T. Bui	\$450
Franklin J. Contreras, Jr.	\$450
Robert C. Huttenhoff	\$450
Paul S. Ocampo	\$410
Samuel J. Romero	\$410
Melissa Davis Lowe	\$385
Kiara W. Gebhart	\$375
Rika M. Kido	\$325
Ryan O'Dea	\$325
Heather B. Dillion	\$250
Elyza P. Eshaghi	\$250

Paralegals:

Lorre E. Clapp	\$225
Pamela G. Little	\$225
Erlanna L. Lohayza	\$225
Patricia A. Britton	\$195
Melanie G. Rodgers	\$195
Steve P. Swartzell	\$185
Anne Marie Vernon	\$185
Tammy Walsworth	\$185
Arland Udo	\$165
Tonia Mann-Wooten	\$150

Of Counsel:

A. Lavar Taylor	\$525
Donald R. Kurtz	\$525
Gregory J. Anderson	\$450

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
8105 Irvine Center Drive, Suite 600, Irvine, CA 92618

A true and correct copy of the foregoing document entitled (*specify*): **CHAPTER 7 TRUSTEE'S APPLICATION TO EMPLOY SHULMAN HODGES & BASTIAN LLP AS GENERAL COUNSEL; DECLARATION OF LEONARD M. SHULMAN IN SUPPORT THEREOF**

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **September 16, 2014**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Interested Party:** Frank Cadigan frank.cadigan@usdoj.gov
- **Attorney for Debtor:** Melissa A Clark bk_hearings@higbeeassociates.com, mclark@firstsourcelaw.com
- **Attorney for H&H64, Inc.:** Franklin S Davidson seth@sethdavidsonlaw.com
- **Interested Party:** Michael Jones mike@mjthelawyer.com, michaeljonesmyecfmail@gmail.com
- **Interested Party:** Neal Salisian neal.salisian@salisianlee.com, ECF@salisianlee.com
- **Interested Party:** United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov
- **Chapter 7 Trustee:** John M Wolfe (TR) john.wolfe@txitrustee.com, ecf.alert+jmwolfe@titlexi.com
- **Interested Party:** Helen Wong helenwong.law@gmail.com

Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) **September 16, 2014**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Debtor

Murad Shuqom
26895 Aliso Creek Rd., Ste. B119
Aliso Viejo, CA 92656

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

September 16, 2014 Erlanna Lohayza

Date

Printed Name

/s/ Erlanna Lohayza

Signature