

STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

IN RE:) CHAPTER 11
)
DAVID L. GEERTS and)
JULIE A. NORMAN-GEERTS,) Case No. 17-80321
)
Debtors.)

**NOTICE OF HEARING ON MOTION FOR AUTHORITY TO
EMPLOY AUCTIONEER AND TO SELL EQUIPMENT BY PUBLIC AUCTION**

TO: See attached service list.

David L. Geerts and Julie A. Norman-Geerts, Debtors, have filed with this Court their Motion for Authority to Employ Auctioneer and to Sell Equipment by Public Auction.

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, you or your attorney must:

1. File a written response to the Motion on or before the date set for the hearing on the Objection at:

Clerk of Court
United States Bankruptcy Court
Stanley J. Roszkowski – U.S. Courthouse
327 South Church Street
Rockford, IL 61101

OR

2. Attend the hearing scheduled to be held on **Friday, August 11, 2017 at 11:00 a.m.** at the United States Bankruptcy Court, 327 South Church Street, Rockford, Illinois 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 of your Response to:


Attorney Jocelyn L. Koch
HolmstromKennedyPC
P.O. Box 589
Rockford, IL 61105-0589

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting that relief.

Dated: July 21, 2017

David L. Geerts and Julie A. Norman-Geerts,
Debtors,

BY: HOLMSTROMKENNEDYPC,
Their Attorneys

BY:  _____
One of its Attorneys

ATTORNEY BRADLEY T. KOCH #3122997
ATTORNEY JOCELYN L. KOCH #6298482
ATTORNEY ALLISON M. HUNTLEY #6317951
HolmstromKennedyPC
800 North Church Street
P.O. Box 589
Rockford, IL 61105-0589
(815) 962-7071

PROOF OF SERVICE

The undersigned, being first duly sworn, states that a copy of the foregoing **Notice of Hearing and Motion for Authority to Employ Auctioneer and to Sell Equipment by Public Auction** were served upon the parties and attorneys of record herein, by either the Court's ECF Notification System or by depositing said envelope, with postage fully prepaid by first class mail, in the United States Post Office mailbox in Rockford, Illinois on the 21st day of July, 2017:

Farm Credit Services of America P.O. Box 2409 Omaha, NE 68103-2409	Kenneth G. Schipper c/o Attorney Bernard J. Natale 1639 N. Alpine Rd., Suite 401 Rockford, IL 61107	Attorney Debra L. Schneider Office of the U.S. Trustee, Region 11 780 Regent Street, Suite 304 Madison, WI 53715
Community State Bank c/o Attorney William J. Barrett Barack Ferrazzano Kirschbaum & Nagelberg LLP 200 West Madison Street Suite 3900 Chicago, IL 60606	Attorney Nicole I. Pellerin Attorney Brian P. Thill Attorney Jane F. (Ginger) Zimmerman Murphy Desmond S.C. 33 E. Main Street, Suite 500 Madison, WI 53703	Attorney Mary A. Corrigan Attorney Mark A. Bogdanowicz Howard & Howard Attorneys PLLC 211 Fulton Street, Suite 600 Peoria, IL 61602

With a copy of the Notice only forwarded to the below-named individuals:

AgCo Finance P.O. Box 2000 Johnston, IA 50131	American Express P.O. Box 981535 El Paso, TX 79998-1535	Capital One (USA), N.A. by American InfoSource LP as agent P.O. Box 71083 Charlotte, NC 28272-1083
Chadwick Oil & AG Services, Inc. P.O. Box 205 Chadwick, IL 61014	Chase Slate P.O. Box 15298 Wilmington, DE 19850-5298	CNH Industrial Capital America LLC P.O. Box 3600 Lancaster, PA 17604
CNH Productivity Plus Account P.O. Box 78004 Phoenix, AZ 85062-8004	Community State Bank 1325 17th Street Fulton, IL 61252	Consolidated Grain and Barge Co. 928 Walton Road Dixon, IL 61021
David Conner 6605 N. Smith Road Edwards, IL 61528	Department of Defense US Army Corps of Engineers Clock Tower Building PO Box 2004 Rock Island, IL 61204-2004	Eastern Iowa Petro 4540 Lincolnway Street Clinton, IA 52732
Gurstel Law Firm, P.C. 4401 Weston Parkway, Suite 370 West Des Moines, IA 50266	IH Mississippi Valley Credit Union P.O. Box 1010 Moline, IL 61266	John Deere Financial Attn: Jerry McMains PO Box 6600 Johnston, IA 50131

Ken & Mike Rentals
118 E. Main Street
Morrison, IL 61270

Ken Duncan
1741 Industrial Drive
Sterling, IL 61081

Lance Coers
21223 266th Street North
Cordova, IL 61242

Lease Consultants Corp.
P.O. Box 71397
Des Moines, IA 50325

Merchants Bank Equipment Finance
Attn: Corey Hothan
7600 Parklawn Avenue, Suite 384
Minneapolis, MN 55435

Stacy Wellford
Midwestern BioAg, Inc.
918 Deming Way, Suite 200
Madison, WI 53717

PHI Financial Services
P.O. Box 733260
Dallas, TX 75373

QC Dental Docs, P.C.
3024 Victoria Street
Bettendorf, IA 52722

Sheffield Financial
P.O. Box 580229
Charlotte, NC 28258-0229

Southeast National Bank Visa
P.O. Box 790408
Saint Louis, MO 63179

Stearns Bank - EFD
P.O. Box 750
Albany, MN 56307

US Department of Agriculture
Whiteside Co. Farm Service Agency
16255 Liberty St.
Morrison, IL 61270

Attorney Gary E. Green
Clark Hill PLC
130 E. Randolph Street, Suite 3900
Chicago, IL 60601-7553

Attorney Sherry Lowe Johnson
Clark Hill PLC
130 E. Randolph Street, Suite 3900
Chicago, IL 60601-7553

Internal Revenue Service
Centralized Insolvency Operation
P.O. Box 7346
Philadelphia, PA 19101-7346

Soil Service
P.O. Box 403
91 South Adams
Carthage, IL 62321

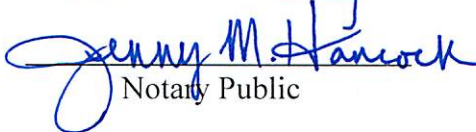
Kay Spidahl
Chadwick Oil & AG Services, Inc.
P.O. Box 205
Chadwick, IL 61014

Ken Kophamer/Blean Realty
118 East Main Street
Morrison, IL 61270

Attorney Douglas R. Lindstrom Jr.
Lane & Waterman
220 N. Main Street, Suite 600
Davenport, IA 52801



Subscribed and sworn to before me
this 21st day of July, 2017.


Notary Public

ATTORNEY BRADLEY T. KOCH #3122997
ATTORNEY JOCELYN L. KOCH #6298482
ATTORNEY ALLISON M. HUNTLEY #6317951
HolmstromKennedyPC
800 North Church St., P.O. Box 589
Rockford, IL 61105-0589
(815) 962-7071

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

IN RE:) **CHAPTER 11**
)
DAVID L. GEERTS and)
JULIE A. NORMAN-GEERTS,) **Case No. 17-80321**
)
Debtors.)

**MOTION FOR AUTHORITY TO EMPLOY
AUCTIONEER AND TO SELL EQUIPMENT BY PUBLIC AUCTION**

David L. Geerts and Julie A. Norman-Geerts, Debtors, by their attorneys, HolmstromKennedyPC, for their Motion for Authority to Employ Auctioneer and to Sell Equipment at Public Auction state:

1. David L. Geerts (“David”) and Julie A. Norman-Geerts, Debtors and Debtors in Possession (collectively the “Debtors”), filed a Voluntary Petition for Relief pursuant to Chapter 11 of the Bankruptcy Code on February 17, 2017.
2. Debtors are presently in possession, operating and managing their business.
3. A Creditors Committee, as provided under §1102 of the Bankruptcy Code, has been appointed in the Debtors’ bankruptcy proceeding.
4. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This Motion is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (N), and (O).
5. The statutory basis for the relief requested within this Motion is §§ 327 and 363 of the Bankruptcy Code and Bankruptcy Rules 2002(a)(2), 2014(a), and 2016.
6. Prior to the commencement of this bankruptcy proceeding, David was engaged in the conduct of a farming and excavating business.

7. The reorganization of the Debtors' business will include David ceasing to operate a farming business while continuing to engage in an excavating business. In furtherance of the reorganization process, the Debtors have leased all of their farmland to third parties for the year 2017 and have engaged, with the approval of this Court, Ken Duncan of Duncan Land & Auction, Inc. as a real estate broker to list and market for sale certain real property consisting of farmland situated in Rock Island County, Illinois, commonly known as the Schipper Farm, farmland consisting of approximately 181 acres in Whiteside County, Illinois, commonly known as the Brummel Farm and real estate commonly described as 2002 16th Avenue, Fulton, Illinois, consisting of approximately 17.86 acres of development lots.

8. The reorganization of the Debtors' business will also include the sale of certain farm equipment utilized by David in the operation of his farming business.

9. David desires to retain Steven J. Almburg of Almburg Auctioneering Inc. ("Almburg") as an auctioneer for the purpose of conducting a public auction of certain farm equipment, which equipment is described upon Exhibit A, a true and correct copy of which is attached hereto and hereby incorporated by reference (collectively "Equipment").

10. Community State Bank ("Bank") possesses a lien, security interest and encumbrance against a 2005 flatbed trailer ("Flatbed") and all non-titled Equipment, while Farm Credit Services of America ("Farm Credit") possesses a prior lien, security interest and encumbrance against a Walker Sprayer ("Sprayer") and John Deere Financial a prior lien, security interest and encumbrance against a 2012 John Deere 1770 NT Planter ("Planter") within the Equipment to be sold pursuant to the public auction.

11. In furtherance of the retention of Almburg as an auctioneer, David will execute an Equipment Auction Agreement ("Agreement") with Almburg which provides, in pertinent part, for the Equipment to be sold through an online internet auction utilizing Auction Time with an

auction to occur every Wednesday prior to October 31, 2017 when the auction of the Equipment is to be concluded, a true and copy of which Agreement is attached hereto and hereby incorporated by reference as Exhibit B.

12. A reserve price equal to the amount of the indebtedness to Farm Credit secured by the Sprayer and John Deere Financial secured by the Planter shall be established for the auction sale of the Sprayer and Planter, respectively.

13. The Agreement provides that Almburg shall advertise the Equipment for sale which will include taking digital pictures of each item of Equipment and, where warranted, a video of each item of the Equipment, and will also show the Equipment to any potential buyers prior to the conduct of the auction.

14. The auction sale of the Equipment shall be free and clear of liens and encumbrances with any liens and encumbrances to attach to the proceeds of sale in the same order of priority that such lien and encumbrance possessed against the Equipment.

15. The net proceeds of sale from the Equipment, after the payment of costs and expenses of sale including the commission to Almburg, shall be paid to the Debtors and deposited into their cash collateral bank account.

16. Almburg shall be paid a commission equal to 4.2% of the highest bid received for each item of Equipment sold at the auction and Auction Time shall receive the following payments for the use of its service in the conduct of the auction:

<u>Sales Price - Each Item of Equipment</u>	
\$15,000.00 and over	\$495.00
\$10,000.00 to \$14,999.00	\$395.00
\$5,000.00 to \$9,999.00	\$295.00
\$0.00 to \$4,999.00	2%

17. In the event the bids received at the auction for the sale of the Sprayer and/or the Planter are not greater than the reserve price for the Sprayer and/or Planter, David will promptly

surrender all of his right, title and interest in and to such Sprayer and/or Planter to Farm Credit and/or John Deere Financial respectively in satisfaction of his indebtedness secured by a lien against the Sprayer and/or Planter.

18. During the conduct of the Auction, the Debtors may periodically file a report with this Court (the "Report") regarding the results of the auction which will set forth for each item of Equipment sold at the auction: the identity of prevailing successful bidder, the gross sales price, costs and expenses of sale including commission, the net sales proceeds and the identity of the person or creditor to receive the net sales proceeds. The Report shall be served upon the following parties: United States Trustee, the Creditors Committee, Bank, Farm Credit and John Deere Financial, and any other party who has entered an appearance in the case and has requested notice. Any objection to the Report shall be filed and served within seven (7) days of the filing and service of the Report. In the event an objection to a Report is not filed and served in a timely manner, the Debtors shall disburse the net sales proceeds from their cash collateral account consistent within the Report.

19. Any objection to a Report shall be scheduled for a hearing before the Bankruptcy Court not later than fourteen (14) days after the filing of the objection to the Report. The Debtors shall disburse the net sale proceeds from their cash collateral bank account consistent with the contents of the Report or any order entered by this Court upon any objection to the Report.

20. The Debtors are in the process of preparing their Disclosure Statement and Plan of Reorganization which will be filed with this Court which will provide, in pertinent part, for the auction sale of the Equipment by Almburg consistent with the terms and conditions set forth within this Motion.

21. To the best of the Debtors' knowledge, Almburg does not own or represent an interest adverse to or have any connection with the Debtors, any creditor of the Debtors or any

other party in interest, including the Office of the United States Trustee or any employee of the United States Trustee as set forth upon the Affidavit which is attached hereto and hereby incorporated by reference as Exhibit C.

22. It is in the best interest of the Debtors and their creditors and will promote the reorganization of their business that the Debtors be authorized to sell the Equipment at a public auction and to execute the Agreement so as to retain Almburg as an auctioneer for the purpose of conducting a public auction sale of the Equipment free and clear of liens and encumbrances, with any liens and encumbrances to attach to the proceeds of sale in the same order of priority that such liens and encumbrances possessed against the Equipment.

WHEREFORE, David L. Geerts and Julie A. Norman-Geerts, Debtors and Debtors in Possession, respectfully request the entry of an Order by this Court containing the following relief:


- A. Authorizing David L. Geerts and Julie A. Norman-Geerts, Debtors and Debtors in Possession, to retain Almburg Auctioneering Inc. as an auctioneer for the purpose of conducting a public auction of the Equipment;
- B. Authorizing Dave L. Geerts to execute the Agreement;
- C. Approving and authorizing David L. Geerts and Julie A. Norman-Geerts, Debtors, to sell the Equipment at a public auction, free and clear of liens and encumbrances, with any liens and encumbrances against the Equipment to attach to the proceeds of sale in the same order of priority as such liens and encumbrances possessed against the Equipment;
- D. Authorizing David L. Geerts and Julie A. Norman-Geerts, Debtors, to pay all costs and expenses, including the commission set forth within the Agreement, incurred in the conduct of the auction of the Equipment by Almburg Auctioneering Inc.;
- E. Authorizing David L. Geerts and Julie A. Norman-Geerts, Debtors, to deposit the net sales proceeds from the sale of the Equipment into their cash collateral bank account to be disbursed consistent with the subsequent order of this Court upon the Report.

- F. Authorizing David L. Geerts and Julie A. Norman-Geerts, Debtors, to disburse the net sales proceeds from the sale of the Equipment consistent with the contents of any periodic Report filed with this Court absent the filing of a timely objection to any periodic Report;
- G. Authorizing David L. Geerts and Julie A. Norman-Geerts, Debtors, to surrender all of their right, title and interest in and to the Walker Sprayer to Farm Credit Services of America in the event a public auction of the Walker Sprayer does not generate sufficient funds to pay the amount of the indebtedness to Farm Credit Services of America secured by a lien against the Walker Sprayer in full, which surrender shall be in satisfaction of the indebtedness of David L. Geerts and Julie A. Norman-Geerts to Farm Credit Services of America secured by a lien against the Walker Sprayer;
- H. Authorizing David L. Geerts and Julie A. Norman-Geerts, Debtors, to surrender all of their right, title and interest in and to the 2012 John Deere 1770 NT Planter to John Deere Financial in the event a public auction of the 2012 John Deere 1770 NT Planter does not generate sufficient funds to pay the indebtedness to John Deere Financial secured by a lien against the 2012 John Deere 1770 NT Planter in full, which surrender shall be in satisfaction of the indebtedness to John Deere Financial secured by a lien against the 2012 John Deere 1770 NT Planter; and
- I. For such other and further relief as the Court deems just and equitable.

Dated: July 21, 2017

David L. Geerts and Julie A. Norman-Geerts, Debtors,

BY: HolmstromKennedyPC,
Their Attorneys

BY: 

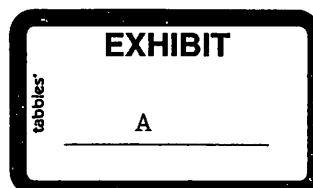
One of its Attorneys

ATTORNEY BRADLEY T. KOCH #3122997
ATTORNEY JOCELYN L. KOCH #6298482
ATTORNEY ALLISON M. HUNTLEY #6317951
HolmstromKennedyPC
800 North Church Street
P.O. Box 589
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EQUIPMENT TO BE SOLD

Description -Trailers
1997 Trailer (Calico) VIN: 4GAHC1628V1000068
2011 Trailer (Look) VIN: 53BTB1018BA000537
1956 AMC 45ft Drop Deck Trailer, Ext. Frame
Miller Tilt-Top Trailer
2-20 ft Steel Containers
2-Tandem Trailer Dollies

Description - Tractors
Allis Chalmers C. Gas Tractor, Restored
Cat 941B Crawler Loader, 3879 hrs
Cat D4HLGP III Dozer, 5,100 hrs
Linkbelt 2700 Excavator, 9,298 hrs, Amulet thumb atch
3 Buckets for Linkbelt Excavator
Skid Steer Rock Buckets on w/ Grapple
Skid Steer Hyd Mower
Skid Steer 6 way Dozer Blade
Skid Steer Stump Grinder
Skid Steer 2-1 Bucket
Skid Steer Brillion Seeder
Skid Steer Tree Shear
Skid Steer 10ft Snow Push Box



Description – Farm Machinery - Equipment
McFarlane 134 Drag Harrow 8 Bar
DMI Tigermate II 32ft Field Cult
FLAC-Kappa 4500 Tiller, 15ft
Univerferth 132 Ripper 5 Shank w/ Elk Creed Caddy
Brillion 16 ft Packer Roller
Oliver Plow
Hitch Doc HSC 2000 tender
Doyle Fert Buggy
Dalton Liquid Nitrogen 7 Shank Applicator
Kuntz Box Scraper 9 yard
2004 Schulte 2500 Rock Picker
2009 Schulte SRW 1400 Rock Windrower
Demco 1050 Track Grain Cart
Brent 540 Gravity Wagon
MC 975 Grain Dryer
2 – 1,000 gal tanks on running gears
3 Augers, 10", 8", 30 ft, 50ft, 3ft, 60ft, 70ft
Westfield 31ft auger, gas motor w/ swing under load hopper
Westfield 70ft 10: Auger w/ swing hopper
Woods 3180 Batwing Mower
Woods Hyd Rear Blade
Woods 3pt Post Hole digger
F&F 3pt Seeder
Fimco 3pt Sprayer
Older PTO Manure Spreader
(2) Hayracks
(2) 2500 Gal Robo Mold Tanks on skids
1600 Cone Tank w/stand
Jet-Co 1200 Gal Tank w/ Trailer
1000 Propane Tank on Trailer
1500ft of new 6" tile 160ft of 8"
Several New DW Tile Fittings
MF 880 7BTM on Land Hitch Plow
1993 Peterbilt Truck
Nest Tractor

LIEN HOLDERS – EQUIPMENT TO BE SOLD

Description	Lien Holder
2005 Trailer (Mauer GN) Flat Bed 25 ft w/HYD Tail VIN: IM9GD422755152455	Community State Bank has title
Walker Sprayer (8809)	Farm Credit Services of America
2012 John Deere 1770 NT Planter	John Deere Financial

July 14th 2017

AUCTIONEER: ALMBURG AUCTIONEERING INC.

SELLER(S): David Geerts, and other Lien Holders or those with interest in the equipment.

AUCTION TIME EQUIPMENT AUCTION AGREEMENT

IN CONSIDERATION OF THE FOLLOWING AGREEMENTS AND OF THE EFFORTS TO PROCURE A PURCHASER FOR THE EQUIPMENT THEREON DESCRIBED BELOW, THE UNDERSIGNED (*SELLER*) APPOINTS YOU (*ALMBURG AUCTIONEERING*) LIC#440.000771 MALTA, IL 815-739-3703 AS SALES AGENT WITH THE SOLE AND EXCLUSIVE RIGHT TO SELL THE EQUIPMENT OWNED BY David Geerts Frog Pond Road, Fulton, Illinois. Phone cell 309-235-1601. email DGEERTS@GMAIL.COM. AUCTIONEER SHALL HAVE SOLE AUTHORITY TO ADVERTISE EQUIPMENT IN TRACTOR HOUSE MAGAZINE, AUCTION TIME MAGAZINE, TRACTOR HOUSE ONLINE, AUCTION TIME ONLINE AND ON ALMBURG EQUIPMENT ON LINE WEBSITES. **AUCTIONEER AGREES:** TO MAKE A CONTINUED & EARNEST EFFORT TO SELL THE PROPERTY, TO COOPERATE WITH ALL DEALERS, PUBLIC AND PRIVATE BUYERS PROVIDE ALL INFORMATION TO PROSPECTIVE BUYERS, AND WILL PLACE & WRITE ALL ADVERTISEMENT & PRESENT IT IN A WAY TO ACHIEVE THE HIGHEST PRICE. AUCTIONEERS WILL PAY TO SELLER AND DELIVER FUNDS AS DIRECTED BY SELLER AFTER CHECKS CLEAR FROM PURCHASERS. AUCTIONEERS DO NOT OWN OR HAVE ANY FINANCIAL INTEREST IN THE ITEM(S) BEING OFFERED FOR AUCTION.

AUCTIONEERS WILL CONDUCT THE SALE ON THE AUCTION TIME ONLINE AUCTION WEB SITE ON STARTING 2 WEEKS AFTER COURT APPROVAL AS AUCTIONEER AND ALL ITEMS LIQUIDATED AT AUCTION ON OR BEFORE OCTOBER 31ST 2017.

SELLER(S) AGREE:

- 1) TO COOPERATE FULLY WITH THE AUCTIONEER.
- 2) TO CONDUCT ALL NEGOTIATIONS THROUGH AUCTIONEER.
- 3) NO ITEM CAN BE SOLD OR PRICED TO OTHERS BEFORE THE AUCTION.
- 4) HAVE CLEAR TITLE FOR ANY LICENSED VEHICLES IN HAND AND READY TO TRANSFER TO PURCHASER AT CONCLUSION OF AUCTION.
- 5) PAY THE **AUCTION COMMISSION OF 4.2% OF THE HIGH BID ESTABLISHED AT THE CLOSE OF BIDDING ON AUCTION TIME ALONG WITH THE AUCTION TIME RATES LISTED BELOW.**

ITEMS BEING OFFERED ON AUCTION TIME SELLING ON THE AUCTION.

...See attached list.

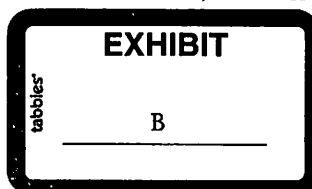
AS SELLER(S) I hereby commission you to sell the items listed above to the highest bidder by public auction. I certify that I am the owner of the listed goods, merchandise. and/or property and have good title and the right to sell and that all are free from any and all encumbrances. I agree to accept all responsibility for any payments due others who might have an interest in the items listed and all sales tax that may be owed for the sale of these units and providing merchantable title and for delivery of title to purchaser. I agree to hold harmless the auctioneers against claims arising because of any breach of the above certification or failure to convey such good and merchantable title.

IF THE AUCTION IS CANCELED OR POSTPONED FOR ANY REASON, THE RESPONSIBLE PARTY WILL REIMBURSE AUCTION TIME \$990.00. THE RATES CHARGED BY THEM FOR THE SELLING OF EACH INDIVIDUAL ITEM.

ACCEPTED: _____
REPRESENTATIVE OF SELLER

ACCEPTED: Steven J Almburg
Almburg Auctioneering Inc. By Steve Almburg

AUCTION TIME RATES: \$0.00 - \$4,999.00-----2%	\$5,000.00 - \$9,999.00-----\$295.00
\$10,000.00 - \$14,999.00---\$395.00	\$15,000.00 & OVER-----\$495.00



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

IN RE:)	CHAPTER 11
)	
DAVID L. GEERTS and)	
JULIE A. NORMAN-GEERTS,)	Case No. 17-80321
)	
Debtors.)	

AFFIDAVIT OF STEVEN J. ALMBURG

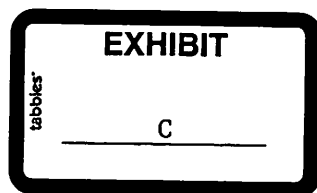
Steven J. Almburg deposes and states as follows:

1. I am a licensed auctioneer employed by Almburg Auctioneering Inc. and submit this Affidavit in support of the Motion for Authority to Employ Auctioneer and to Sell Equipment by Public Auction ("Motion) filed by David L. Geerts and Julie A. Norman-Geerts, Debtors.

2. To the best of my knowledge, Almburg Auctioneering Inc. does not hold or represent any interest adverse to or have any connection with David L. Geerts and Julie A. Norman-Geerts, Debtors, any creditors of the Debtors, or any other party in interest or their respective attorneys or accountants, including the Office of the United States Trustee or any employees of the Office of the United States Trustee.

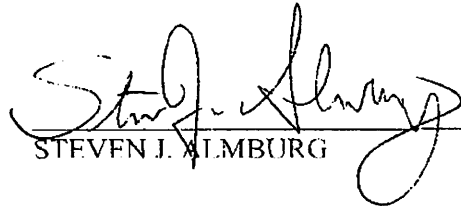
3. I am familiar with the equipment to be sold at the public auction, which equipment is set forth upon Exhibit A attached to the Motion.

4. If called as a witness, I can competently testify to the matters set forth herein.



5. Under penalties of perjury as provided by law, I certify that the statements set forth in this Affidavit are true and correct, except as to matters therein stated to be on information and belief, and as to such matters I certify as aforesaid I believe the same to be true.

FURTHER AFFIANT SAYETH NOT.



STEVEN J. ALMBURG

ATTORNEY BRADLEY T. KOCH #3122997
ATTORNEY JOCELYN L. KOCH #6298482
ATTORNEY ALLISON M. HUNTLEY #6317951
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