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10 Proposed Attorneys for Peter M. Bucklin dba PMB Development Co., and dba
11 The Peter M. and Joan B. Bucklin Revocable Trust

12 IN THE UNITED STATES BANKRUPTCY COURT

13 DISTRICT OF OREGON

14 In re	}	
15 Peter M. Bucklin dba PMB Development 16 Co., and dba The Peter M. and Joan B. 17 Bucklin Revocable Trust,	}	Case No. 10-64467-fra11
18 Debtor.	}	APPLICATION OF DEBTOR FOR 19 AUTHORITY TO EMPLOY 20 ATTORNEYS (Sussman Shank LLP)

21 Pursuant to 11 USC §§ 327, 1103(a), and Bankruptcy Rule 2014, Peter M.
22 Bucklin dba PMB Development Co., and dba The Peter M. and Joan B. Bucklin
23 Revocable Trust (the "Debtor"), makes application to the Court for authority to employ
24 the firm Sussman Shank LLP ("Sussman Shank") as its attorneys to provide
25 professional services in connection with the administration of this case. In support of
26 this Application, Debtor states the following:

1. On July 23, 2010 (the "Petition Date"), the Debtor filed a Voluntary Petition
for relief under Chapter 11 of the U.S. Bankruptcy Code in the District of Oregon.

2. The Debtor wishes to employ Sussman Shank, attorneys duly admitted to
practice in this Court, as its counsel in this case.

1 3. The Debtor has selected the firm of Sussman Shank because of its
2 experience and knowledge in the field of bankruptcy law, and believes that Sussman
3 Shank is well qualified to represent it in this case.

4 4. The Debtor has elected to engage Sussman Shank to perform all of the
5 services necessary and desirable to the conduct of the above-captioned Chapter 11
6 case on behalf of the Debtor, with such representation to be effective as of the Petition
7 Date.

8 5. Sussman Shank has indicated its willingness to serve as counsel for the
9 Debtor and to follow the directions of the Debtor regarding the scope of the firm's
10 activities on its behalf, and to receive compensation for professional services rendered
11 and expenses incurred in accordance with the provisions of Sections 328, 330, and 331
12 of the Bankruptcy Code.

13 6. To the best of the Debtor's knowledge, Sussman Shank has no
14 connection with the creditors or any other adverse party or its attorneys except as set
15 forth in the Rule 2014 Statement filed herewith.

16 7. The proposed rates of compensation, subject to final Court approval, are
17 the customary hourly rates in effect when services are performed by the attorneys,
18 paralegals, and legal assistants of Sussman Shank. The firm's professionals' current
19 hourly rates are set forth in Exhibit 1 attached hereto. The hourly rates are subject to
20 periodic adjustment to reflect economic conditions and increased experience and
21 expertise in this area of law.

22 //

23 //

24 //

1 WHEREFORE, the Debtor prays that it be authorized to employ the firm of
2 Sussman Shank to represent it in this case pursuant to the provisions of the Bankruptcy
3 Code.

4 Dated this 23st day of July, 2010.

5 Peter M. Bucklin dba PMB Development Co.,
6 and dba The Peter M. and Joan B. Bucklin
Revocable Trust

7 */s/ Peter M. Bucklin*

8 By _____
Peter M. Bucklin

9
10 PRESENTED BY:

11 SUSSMAN SHANK LLP

12 */s/ Thomas W. Stilley*

13 _____
14 Thomas W. Stilley, OSB No. 883167
15 Timothy A. Solomon, OSB No. 072573
Proposed Attorney for Debtor and
Debtor-In-Possession

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18 F:\CLIENTS\20907\002\PLEADINGS\IP-APPLICATION TO EMPLOY (SUSSMAN SHANK).DOC

FIRM RESOURCE DIRECTORY

BILLING RATES

FY 2009/2010 BILLING RATES

Timekeeper Codes	Timekeeper	Standard Hourly Rate
<u>Partners:</u>		
BPC	Barry P. Caplan	425
JRS	Jeffrey R. Spere	350
HML	Howard M. Levine	425
JCM	Jeffrey C. Misley	395
JEM	John E. McCormick	345/370 "Tax"
MGH	Michael G. Halligan	330
RLC	Robert L. Carlton	405
TWS	Thomas W. Stillely	405
KLC	Nena Cook	330
GWM	Skip W. McKallip Jr.	320
SSF	Susan S. Ford	385
DDH	Darin D. Honn	330/345 "IP"
JST	Jeffrey S. Tarr	330/360 "Tax"
JWA	Jason W. Alexander	290
RWN	Robert W. Nunn	325/335 "Tax"
JAS	John A. Schwimmer	400
WGF	William G. Fig	250
EAS	Elizabeth A. Semler	250
HAK	Heather A. Kmetz	275/315 "Tax"
MPM	Martin P. Meyers	350
<u>Special Counsel:</u>		
MDL	Michael D. Levelle	285
HMH	Harry M. Hanna	340/375 "Tax"
JDB	Jeff D. Brecht	235
AJB	Aaron J. Besen	350
<u>Associates:</u>		
LRH	Laurie R. Hager	230
DGT	Dallas G. Thomsen	245/260 "IP/Tax"
PGR	Patrick G. Rowe	260
DRM	Dustin R. Moyes	220
GSA	Gabriela Sanchez	225
HBL	Heather B. Lee	260
TAS	Timothy A. Solomon	275
JFM	James F. Marron	250

FIRM RESOURCE DIRECTORY

BILLING RATES

Paralegals:

MWB	Michelle W. Bodenheimer	135
SMB	Sally M. Browning	165
MLD	Michelle L. Dolan	180
JCH	Juliette C. Horwitz	140
KLM	Kathryn L. Maggio	125
KAM	Kathy A. Moody	165
MJJ	Mary Jo Smith	170
TLW	Teresa L. Whitcomb	155

Legal Assistants:

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re)
Peter M. Bucklin, et al.,) Case No. 10-64467-fra11
)
)
Debtor(s)) RULE 2014 VERIFIED STATEMENT
) FOR PROPOSED PROFESSIONAL

Note: To file an amended version of this statement per ¶19, file a fully completed amended Rule 2014 statement on LBF #1114 and clearly identify any changes from the previous filed version.

1. The applicant is not a creditor of the debtor except:
2. The applicant is not an equity security holder of the debtor.
3. The applicant is not a relative of the individual debtor.
4. The applicant is not a relative of a general partner of the debtor (whether the debtor is an individual, corporation, or partnership).
5. The applicant is not a partnership in which the debtor (as an individual, corporation, or partnership) is a general partner.
6. The applicant is not a general partner of the debtor (whether debtor is an individual, corporation, or partnership).
7. The applicant is not a corporation of which the debtor is a director, officer, or person in control.
8. The applicant is not and was not, within two years before the date of the filing of the petition, a director, officer, or employee of the debtor.
9. The applicant is not a person in control of the debtor.
10. The applicant is not a relative of a director, officer or person in control of the debtor.
11. The applicant is not the managing agent of the debtor.
12. The applicant is not and was not an investment banker for any outstanding security of the debtor; has not been, within three years before the date of the filing of the petition, an investment banker for a security of the debtor, or an attorney for such an investment banker in connection with the offer, sale, or issuance of a security of the debtor; and is not and was not, within two years before the date of the filing of the petition, a director, officer, or employee of such an investment banker.
13. The applicant has read 11 U.S.C. §101(14) and §327, and FRBP 2014(a); and the applicant's firm has no connections with the debtor(s), creditors, any party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee, or any District of Oregon Bankruptcy Judge, except as follows:

The applicant represents J.P. Morgan Chase ("Chase"), a secured creditor of the Debtor on a matter unrelated to the Debtor or this case. Both Chase and the Debtor have consented to the Applicant representing Debtor in this case; however, if litigation becomes necessary between Chase and the Debtor, they will each need to obtain other counsel for such dispute.

14. The applicant has no interest materially adverse to the interest of the estate or of any class of creditors or equity security holders.

15. Describe details of all payments made to you by either the debtor or a third party for any services rendered on the debtor's behalf within a year prior to filing of this case:

3/05/2010 \$5,000 from Debtor

6/16/2010 \$5,000 from Debtor

6/24/2010 \$5,000 from Debtor

7/12/2010 \$15,000 from Debtor

7/22/2010 \$12,000 from Joan Bucklin, Debtor's spouse

16. The debtor has the following affiliates (as defined by 11 U.S.C. §101(2)). Please list and explain the relationship between the debtor and the affiliate:

Robert Rowland & Eleanor Rowland, Business Partners PMB Development Corp., inactive corp.

Chris Bucklin, Business Partner

Michael & Katie Hartmann, Business Partners

James Ollendick, Business Partner

Jeffrey & Catherine Iversen, Business Partners

17. The applicant is not an affiliate of the debtor.

18. Assuming any affiliate of the debtor is the debtor for purposes of statements 4-13, the statements continue to be true except (list all circumstances under which proposed counsel or counsel's law firm has represented any affiliate during the past 18 months; any position other than legal counsel which proposed counsel holds in either the affiliate, including corporate officer, director, or employee; and any amount owed by the affiliate to proposed counsel or its law firm at the time of filing, and amounts paid within 18 months before filing):

19. The applicant hereby acknowledges that he/she has a duty during the progress of the case to keep the court informed of any change in the statement of facts which appear in this verified statement. In the event that any such changes occur, the applicant immediately shall file with the court an amended verified statement on LBF #1114, with the caption reflecting that it is an amended Rule 2014 statement and any changes clearly identified.

THE FOLLOWING QUESTIONS NEED BE ANSWERED ONLY IF AFFILIATES HAVE BEEN LISTED IN STATEMENT 16.

20. List the name of any affiliate which has ever filed bankruptcy, the filing date, and court where filed:

None to the Applicant's knowledge

21. List the names of any affiliates which have guaranteed debt of the debtor or whose debt the debtor has guaranteed. Also include the amount of the guarantee, the date of the guarantee, and whether any security interest was given to secure the guarantee. Only name those guarantees now outstanding or outstanding within the last 18 months:

See Exhibit "A"

22. List the names of any affiliates which have a debtor-creditor relationship with the debtor. Also include the amount and date of the loan, the amount of any repayments on the loan and the security, if any. Only name those loans now outstanding or paid off within the last 18 months:

Michael & Katie Hartmann - Disputed claim against Debtor for approximately \$2,200,000 - co-owner of Berryessa Shopping Center, 211 Peabody Lane, Vacaville, CA

James Ollendick - promissory note from Debtor: \$706, 000 principal, \$9,400 interest owing

23. List any security interest in any property granted by the debtor to secure any debts of any affiliate not covered in statements 20 and 21. List any security interest in any property granted by the affiliate to secure any debts of the debtor not covered in statements 21 and 22. Also include the collateral, the date and nature of the security interest, the name of the creditor to whom it was granted, and the current balance of the underlying debt:

24. List the name of any affiliate who is potentially a "responsible party" for unpaid taxes of the debtor under 26 U.S.C. §6672:

I verify that the above statements are true to the extent of my present knowledge and belief.

/s/ Thomas W. Stilley, Sussman Shank LLP

Applicant

CERTIFICATE OF SERVICE

I, Sue M. Carver declare as follows:

I am employed in the County of Multnomah, State of Oregon; I am over the age of eighteen years and am not a party to this action; my business address is 1000 SW Broadway, Suite 1400, Portland, Oregon 97205-3089, in said County and State.

I certify that on July 23, 2010, I served, via first class mail, a full and correct copy of the foregoing , **APPLICATION OF DEBTOR FOR AUTHORITY TO EMPLOY ATTORNEYS (SUSSMAN SHANK LLP)** to the parties of record, addressed as follows:

n/a

I also certify that on July 23, 2010, I served the above-referenced document(s) on all ECF participants as indicated on the Court's Cm/ECF system.

I swear under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: July 23, 2010.

/s/ Sue M. Carver

Sue M. Carver, Legal Assistant

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