

1 R. Nathan Gibbs, Esq.
2 R. NATHAN GIBBS, LTD.
3 Nevada Bar No. 005965
4 5280 S. Eastern Avenue, D-2
5 Las Vegas, NV 89119
6 Tel. (702) 471-7454
7 Fax (702) 471-6432
8 rmg@ngibbslaw.com
9 Former Attorney for Debtor

6 UNITED STATES BANKRUPTCY COURT

7 DISTRICT OF NEVADA

8 In re:)	
)	BK-S-12-23910-LED
9 ROBERT ALLAN GATLIN,)	Chapter 13
)	
10 Debtor(s).)	
)	Date of Hearing: 9/4/14
)	Time of Hearing: 2:30 p.m.

12 **SUPPLEMENTAL DECLARATION TO FORMER ATTORNEY’S APPLICATION FOR**
13 **COMPENSATION AND REIMBURSEMENT OF EXPENSES NO. 1**

14 COMES NOW R. NATHAN GIBBS, ESQ., of the law firm of R. NATHAN GIBBS, LTD.,
15 former attorney for Debtor, ROBERT ALLAN GATLIN, and files this Supplemental Declaration
16 to Former Attorney’s Application for Compensation and Reimbursement of Expenses No. 1.

17 **DECLARATION**

18 I, R. Nathan Gibbs, hereby declare:

- 19 1. I am competent to testify to the following, make this declaration on my own personal
20 knowledge except to those matters based upon information or belief.
- 21 2. That I filed the within bankruptcy for Debtor ROBERT ALLAN GATLIN on
22 December 21, 2012.
- 23 3. That my hourly rate is \$320.00 per hour. My agreement with Debtor ROBERT
24 ALLAN GATLIN was a flat rate of \$5,400.00 of which \$1,500.00 was paid prior to
25 filing and the remaining balance of \$3,900.00 would be paid through the plan
26 payments.
- 27 4. That the following is a break down solely of all work performed by me or by my
28 staff, at my direction, in the within case:

LAW OFFICES
R. NATHAN GIBBS, LTD.
5280 South Eastern Avenue, Suite D-2
Las Vegas, Nevada 89119

<u>Date Work Performed</u>	<u>Work Performed</u>	<u>Time Spent</u>	<u>Hourly Cost</u>
12/3/12	Work on Petition	2.0	\$640.00
12/19/12	Work on Petition	2.0	\$640.00
12/20/12	Work on Petition	3.0	\$960.00
12/21/12	Work on Petition	2.0	\$640.00
1/4/13	Work on Chapter 13 Plan, Call to Best Case Support	3.0	\$960.00
1/18/13	Prepare Motion for Cramdown on Debtor House, Prepare Notice of Hearing and Certificate of Mailing	1.0	\$320.00
1/24/13	Prepare letter to Creditor (AmerAssist) to cease collection	0.25	\$80.00
2/22/13	Review Client file; Attorney meeting with Client	2.0	\$640.00
2/25/13	Email Client	0.25	\$80.00
2/28/13	Correct and finalize Order on Motion to Strip Lien	0.25	\$80.00
3/14/13	Prepare Notice of Entry of Order	0.25	\$80.00
3/25/13	Prepare letter to Creditor (Olin Realty) to cease collection; Prepare Amendment to include additional creditors; Prepare letter to Trustee w/additional docs requested in TSOP	1.50	\$400.00
3/26/13	Emails/calls between Attorney and Client	0.50	\$160.00
3/30/13	Prepare Bankruptcy Amendments	1.50	\$400.00
4/3/13	Meeting between Attorney and Client	1.0	\$320.00
4/9/13	Appearance at 341 Meeting	1.0	\$320.00
5/3/13	Emails to Client; Call to Trustee's Office to reschedule Continued 341 Meeting	0.50	\$160.00
5/3/13	Prepare new Bankruptcy Plan	1.50	\$400.00
5/6/13	Prepare correspondence to Client	0.50	\$160.00
5/7/13	Amendments to Schedules	0.50	\$160.00
5/20/13	Meeting between Attorney and Client	0.50	\$160.00
5/21/13	Prepare and attend continued 341 Meeting	1.50	\$400.00

LAW OFFICES
R. NATHAN GIBBS, LTD.
 5280 South Eastern Avenue, Suite D-2
 Las Vegas, Nevada 89119

1	5/28/13	Pre-confirmation file work up telephone conference with Trustee's Office	0.30	\$96.00
2				
3	6/13/13	Phone call between Attorney and Client	0.30	\$96.00
4	7/1/13	Phone call to Trustee's Office to move continued 341 Meeting	0.30	\$96.00
5				
6	7/5/13	Prepare new B22C with Trustee's requested changes	1.0	\$320.00
7	7/9/13	Prepare letter to HOA re: Client's home in BK	0.30	\$96.00
8	7/9/13	Prepare new plan with TPI through 5/30/13	0.50	\$160.00
9	7/9/13	Prepare letter to Client re: status of case	0.50	\$160.00
10	7/11/13	Attorney's analysis of case and revisions	1.30	\$416.00
11	7/11/13	Corrections to Schedules	1.50	\$400.00
12	7/15/13	Revise letter to Client, work on amendments	0.80	\$256.00
13	7/18/13	Changes to Amended Schedules	0.30	\$96.00
14	7/22/13	Telephone Conference with Trustee's Office	0.30	\$96.00
15	7/26/13	Prepare letter to Trustee	0.30	\$96.00
16	8/15/13	Attorney analysis of plan needs, telephone conference with Client, revise plan computations	1.80	\$576.00
17	8/15/13	Corrected Schedules I, J, B22C, Chapter 13 Plan #2	2.0	\$640.00
18	8/16/13	Calls to/from Client re: status of case	0.30	\$96.00
19	8/16/13	Telephone Conference with Trustee's Office	0.50	\$160.00
20	8/23/13	Prepare letter to Creditor (TimePayment Corp) to cease collection;	0.20	\$64.00
21	8/23/13	Prepare letter to Client re: status of case and docs needed per Trustee's request	0.50	\$160.00
22				
23	9/18/13	Makes changes to B22C per Trustee's instructions in most recent TSOP	0.50	\$160.00
24				
25	9/24/13	Makes changes to B22C per Trustee's instructions in most recent TSOP; Call to Trustee's Office to see if confirmation date can be moved out	0.50	\$160.00
26				
27	9/25/13	Finalize B22C; Email to Client for approval	0.10	\$32.00
28				

LAW OFFICES
R. NATHAN GIBBS, LTD.
 5280 South Eastern Avenue, Suite D-2
 Las Vegas, Nevada 89119

1	9/26/13	Emails to/from Trustee's Office requesting to move	0.50	\$160.00
2		hearing date		
3	10/7/13	Prepare Notice and Confirmation Hearing date for	0.80	\$256.00
4		Plan #2		
5	11/15/13	Telephone Conference with Trustee's Office	0.50	\$160.00
6	11/19/13	Telephone Conference with Client	0.30	\$96.00
7	12/2/13	Prepare letter to Trustee's Office	0.20	\$64.00
8	12/9/13	Prepare for telephone conference; Telephone	2.0	\$640.00
9		Conference with Trustee's Office; Telephone		
10		Conference with IRS; Prepare correspondence to		
11		Trustee's Office		
12	1/3/14	Prepare correspondence to Client re: docs needed;	2.0	\$640.00
13		Review TSOP; Prepare amendments to Schedules D,		
14		F, J, B22C; Prepare Chapter 13 Plan #3		
15	1/6/14	Call to Client; Prepare fax cover to Trustee's Office	0.30	\$96.00
16		with requested docs		
17	1/15/14	Meeting between Attorney and Client	0.30	\$96.00
18	1/16/14	Meeting between Attorney and Client	0.70	\$224.00
19	1/16/14	Correct Plan #3; Correct Schedule E	1.0	\$320.00
20	2/5/14	Call to Client; Review notes; Email Client re: info	1.50	\$400.00
21		needed; Go over email from Trustee's Office;		
22		Corrections to Plan		
23	2/10/14	Call from Client; Call to Santander; Corrections to	1.0	\$320.00
24		new Plan and Schedules		
25	2/28/14	Corrections to Plan #3; Scan and e-file	0.40	\$128.00
26	3/4/14	Telephone Conference with Trustee's Office	0.30	\$96.00
27	3/7/14	Review Trustee's newest TSOP; Call from Client	0.30	\$96.00
28	3/11/14	Go over newest TSOP, make corrections to Plan	0.50	\$160.00
		payments of mortgage and recalculate plan payments		
	3/12/14	Telephone conference between Attorney and Client	0.20	\$64.00

LAW OFFICES
 R. NATHAN GIBBS, LTD.
 5280 South Eastern Avenue, Suite D-2
 Las Vegas, Nevada 89119

3/13/14	Scan Chapter 13 Plan #4 and email to Sarah Smith at Trustee's Office; Prepare letter to Creditor (Great America Financial Services Corporation) to cease collection	0.50	\$160.00
3/14/14	Discuss changes to Plan per Trustee, Correct Schedules I and J, Scan and email to Client to review	0.50	\$160.00
3/17/14	Telephone Conference with Trustee's Office	0.40	\$128.00
3/28/14	Telephone Conference with Trustee's Office	0.20	\$64.00
4/14/14	Telephone Conference with Trustee's Office	0.20	\$64.00
4/24/14	Email documents to Trustee's Office	0.20	\$64.00
4/28/14	Correct Schedule J, review TSOP	0.50	\$160.00
4/29/14	Telephone Conference with Trustee's Office, analysis of objections raised by Trustee, work on plan and documentation needed	3.90	\$1,248.00
4/29/14	Staff and Attorney review of file and TSOP, Prepare updated Schedule J, B22C, and Plan #4	2.50	\$800.00
5/2/14	Meeting between Attorney and Client	0.80	\$256.00
5/5/14	Telephone Conference with Trustee's Office	0.20	\$64.00
5/27/14	Calls to/from Client	0.50	\$160.00
6/9/14	Telephone Conference with Trustee's Office	0.40	\$128.00
6/24/14	Telephone Conference with Trustee's Office	0.40	\$128.00
6/30/14	Review client file re: docs sent to Trustee	1.0	\$320.00
7/7/14	Telephone Conference with Client	0.50	\$160.00
7/9/14	Telephone Conference with Trustee's Office	0.40	\$128.00
7/9/14	Prepare spreadsheet re: Debtor's bank statements sent to Trustee's Office	3.0	\$960.00
	TOTAL WORK PERFORMED	69.5	\$22,240.00

5. As can be seen above, the amount of work performed exceeds the \$3,900.00 requested, however, the total attorneys fee sought in this Application is **\$3,900.00**. I am not seeking reimbursement of costs or other expenses.

1 I, R. Nathan Gibbs, do declare under the Penalties of Perjury under the laws of the United
2 States of America and the State of Nevada that the foregoing is true and correct, this 3rd day of
3 September, 2014.

4 /s/R. Nathan Gibbs

5
6
7 **CERTIFICATE OF MAILING**

8 I hereby certify that I am an employee of R. NATHAN GIBBS, LTD., and that on the 3rd day
9 of September, 2014, I placed a true and correct copy of SUPPLEMENTAL DECLARATION TO
10 FORMER ATTORNEY'S APPLICATION FOR COMPENSATION AND REIMBURSEMENT
11 OF EXPENSES NO. 1 by regular first class mail at Las Vegas, Nevada with 1st class postage prepaid
12 and addressed as follows:

13 Christopher P. Burke, Esq.
14 218 S. Maryland Parkway
Las Vegas, NV 89101

15 Robert A. Gatlin
16 1521 Ravanusa Drive
Henderson, NV 89052

17 Kathleen A. Leavitt
18 201 Las Vegas Boulevard S., #200
Las Vegas, NV 89101

19
20 /s/Stacey L. Stirling
21 An employee of R. NATHAN GIBBS, LTD.
22
23
24
25
26
27
28