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5 Former Attorney for Debtor

6 UNITED STATES BANKRUPTCY COURT
7 DISTRICT OF NEVADA

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

12 **REPLY TO TRUSTEE’ OPPOSITION TO APPLICATION FOR COMPENSATION**
13 **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 Reply to Trustee’s Opposition
16 to Application for Compensation and Reimbursement of Expenses No. 1.

17 1. The Trustee’s Opposition contained the following factual inaccuracies: Opposition, Page 1,
18 Line 18-19 “Debtor’s Chapter 13 Plan #3 was confirmed on May 19, 2011.” This is incorrect
19 and easily disproved since the case was not filed until December 21, 2012. Attorney Gibbs
20 filed three separate proposed Chapter 13 plans but not a single plan has been confirmed. The
21 most recent plan filed, Chapter 13 Plan #3, was filed by Mr. Gibbs on behalf of the Debtor
22 on February 28, 2014.

23 2. A breakdown of services was not filed as Attorney Gibbs for Debtor is not seeking additional
24 funds but the initial contracted funds which Debtor agreed to pay for in the plan. Debtor has
25 retained new counsel to represent him in this matter, however, Attorney Gibbs believes that
26 he is still entitled to these contracted funds, in the total amount of \$3,900.00. Trustee’s own
27 website still shows that these funds are due Attorney Gibbs (see attached Exhibit A).

28

1 3. A supplement will be filed shortly describing in detail all of the work performed in this
2 matter by Attorney Gibbs.

3 4. Attorney Gibbs is not asking for additional funds in excess of the agreed and contracted price
4 for filing the bankruptcy but is solely asking for the monies contracted between he and
5 Debtor, which is \$3,900.00.

6 DATED this 28th day of August, 2014.

7 R. NATHAN GIBBS, LTD.

8 /s/ R. Nathan Gibbs
9 R. NATHAN GIBBS, ESQ.
10 Nevada Bar No. 005965
11 5280 South Eastern Ave, Suite D-2
12 Las Vegas, NV 89119
13 Former Attorney for Debtor
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EXHIBIT “A”

PRINT INQUIRY

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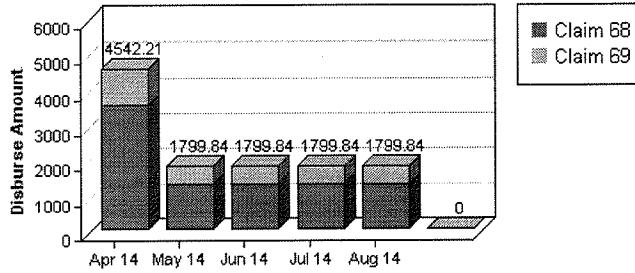
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12-23910-LED	ROBERT ALLAN GATLIN (xxx-xx-8425)	1521 RAVANUSA DRIVE • • HENDERSON • NV • 89052	\$3,405.00 MO	Bar Date(s): 5/13/2013 (has passed) 6/19/2013 (has passed)
Trustee: Kathleen A. Leavitt		Attorney: CHRISTOPHER P BURKE ESQ		
		Confirmed: Not Confirmed		Case Status: ACTIVE

Payee Summary

Number of Claims	72
Total Amount Claimed	\$350,261.71
Total Amount Scheduled	\$939,891.47
Total Principal Paid	\$11,741.57
Total Principal Owed	\$3,900.00
Total Principal Due	\$0.00
Total Interest Paid	\$0.00
Total Interest Due	\$0.00

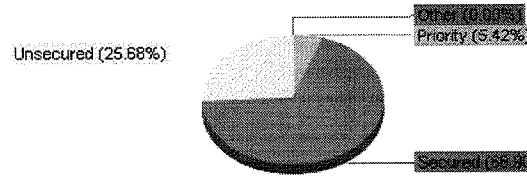
Payee Disbursements Last 6 Months



Claim Breakdown

	Priority	Secured	Unsecured	Other
Claimed	\$38,113.94	\$31,157.02	\$280,990.75	\$0.00
Scheduled	\$50,936.94	\$647,629.87	\$241,324.66	\$0.00
Principal Paid	\$0.00	\$11,741.57	\$0.00	\$0.00
Principal Owed	\$3,900.00	\$0.00	\$0.00	\$0.00
Principal Due	\$0.00	\$0.00	\$0.00	\$0.00
Interest Paid	\$0.00	\$0.00	\$0.00	\$0.00
Interest Due	\$0.00	\$0.00	\$0.00	\$0.00
Monthly Payment	\$0.00	\$1,799.84	\$0.00	\$0.00
Collateral	\$0.00	\$325,425.00	\$0.00	\$0.00

Amount Scheduled by Type



Claims Listing

Priority	Case No	Case Name	Class	Level	No Pymt	Prin Paid	Prin Owed	Clm Amt	Schd Amt	Int Paid	Int Due	Case Plan	No Coll	No Coll	Stop Date	Prin Due
54		PROBER & RAPHAEL A LAW CORPORATION (XXXXXXXX6658)	54	z	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00					\$0.00
57		HELENA C GATLIN (XXXXXXXXMANT)	57	6	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Y	Y	O		\$0.00
58		CHARLES L KENNON III ESQ (XXXXXXXX6-NV)	58	z	0	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00					\$0.00
59		NATIONSTAR MORTGAGE LLC (9516)	59	0	0	\$0.00	\$0.00	\$825.00	\$0.00	\$0.00	\$0.00		X	Y		\$0.00
64		1701-2/3 LLC (9516)	64	0	0	\$0.00	\$0.00	\$850.00	\$0.00	\$0.00	\$0.00			Y		\$0.00
68		NATIONSTAR MORTGAGE LLC (9516)	68	a	2	\$1,295.69	\$8,716.67	\$0.00	\$0.00	\$0.00	\$0.00	Y				\$0.00
69		SANTANDER CONSUMER USA INC (0249)	69	2	\$504.15	\$3,024.90	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Y				\$0.00
29		UNITED STATES TREASURY (2007)	29	I	24	\$0.00	\$0.00	\$20,125.00	\$240,881.80	\$0.00	\$0.00					\$0.00
41		SANTANDER CONSUMER USA INC (0249)	41	B	24	\$0.00	\$0.00	\$1,647.45	\$18,473.78	17.62%	\$0.00					\$0.00
65		Internal Revenue Service (8425)	65	S	24	\$0.00	\$0.00	\$0.00	\$20,125.00	\$0.00	\$0.00					\$0.00
70		MAJESTIC HILLS COMMUNITY ASSOCIATION (6391)	70	S	24	\$0.00	\$0.00	\$1,100.00	\$0.00	\$0.00	\$0.00					\$0.00
55		UNITED STATES TREASURY (2011)	55	T	25	\$0.00	\$0.00	\$34,213.94	\$34,213.94	\$0.00	\$0.00					\$0.00
66		INTERNAL REVENUE SERVICE	66	T	25	\$0.00	\$0.00	\$0.00	\$12,823.00	\$0.00	\$0.00					\$0.00
33		NATIONSTAR MORTGAGE LLC (9516)	33	N	27	\$0.00	\$0.00	\$6,609.57	\$368,149.29	\$0.00	\$0.00					\$0.00
1		United States Bankruptcy Court	1	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00					\$0.00
2		1701-2/3 LLC (8425)	2	U	50	\$0.00	\$0.00	\$10,055.80	\$0.00	\$0.00	\$0.00					\$0.00
3		AARP (XXXXXXXX9980)	3	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00					\$0.00
4		AMGLMTD BNK (XXXXXXXX6417)	4	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00					\$0.00
5		AMALGAMATED BANK (8842)	5	U	50	\$0.00	\$0.00	\$6,089.87	\$5,870.00	\$0.00	\$0.00					\$0.00
6		AMERASSIST (XXXXXXXX6612)	6	U	50	\$0.00	\$0.00	\$0.00	\$585.00	\$0.00	\$0.00					\$0.00
7		AMERICAN EXPRESS (1273)	7	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00					\$0.00
8		AMERICAN EXPRESS (XXXXXXXX2893)	8	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00					\$0.00
9		AMERICAN EXPRESS BANK FSB (3003)	9	U	50	\$0.00	\$0.00	\$630.00	\$630.00	\$0.00	\$0.00					\$0.00
10		AURORA LOAN SERVICES (XXXXXXXX4172)	10	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00					\$0.00
11		BANK OF AMERICA (XXXXXXXX7527)	11	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00					\$0.00
12		BANK OF AMERICA (XXXXXXXX0299)	12	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00					\$0.00
13		BANK OF AMERICA NA (XXXXXXXX658)	13	U	50	\$0.00	\$0.00	\$49,097.26	\$49,141.00	\$0.00	\$0.00					\$0.00
14		BANK OF THE WEST (XXXXXXXX0028)	14	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00					\$0.00
15		FIA CARD SERVICES NA SUCCESSOR IN INTEREST TO (8858)	15	U	50	\$0.00	\$0.00	\$4,149.26	\$4,376.00	\$0.00	\$0.00					\$0.00

PORTFOLIO RECOVERY ASSOCIATES LLC SUCCESSOR IN INT (9813)	16	UNSECURED	U	50	\$0.00	\$0.00	\$0.00	\$2,562.01	\$2,784.00	\$0.00	\$0.00	\$0.00
CAPITAL ONE BANK (USA) NA (9826)	17	UNSECURED	U	50	\$0.00	\$0.00	\$0.00	\$4,461.08	\$4,861.00	\$0.00	\$0.00	\$0.00
CERNO SOLUTIONS, LLC (xxxxxxx1869)	18	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
CHASE (xxxxxxx7941)	19	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
CHEVRON TEXACO/ GE CAPITAL (xxxxxxx1060)	20	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
CITY NTL BK/OCWEN LOAN SERVICE (xxxxxxx8221)	21	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
DISCOVER BANK (4399)	22	UNSECURED	U	50	\$0.00	\$0.00	\$0.00	\$6,606.10	\$7,406.00	\$0.00	\$0.00	\$0.00
PORTFOLIO RECOVERY ASSOCIATES LLC SUCCESSOR IN INTEREST TO (9323)	23	UNSECURED	U	50	\$0.00	\$0.00	\$0.00	\$7,655.34	\$0.00	\$0.00	\$0.00	\$0.00
EXXMBLCITI (xxxxxxx4400)	24	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
GEGRB/BROOKS BROS DC (xxxxxxx9226)	25	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PORTFOLIO RECOVERY ASSOCIATES LLC SUCCESSOR TO (2822)	26	UNSECURED	U	50	\$0.00	\$0.00	\$0.00	\$1,868.39	\$1,790.00	\$0.00	\$0.00	\$0.00
GIA NGUYEN (xxxxxxx77-C)	27	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
HOLOGIC, INC (xxxxxxx5833)	28	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
KARL GATLIN	30	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
KRAMER & ASSOCIATES (xxxxxxx1796)	31	UNSECURED	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$20,150.39	\$0.00	\$0.00	\$0.00
LIGUIDEST SYSTEMS, INC (xxxxxxx0682)	32	UNSECURED	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$2,678.55	\$0.00	\$0.00	\$0.00
NISSN INF LT (xxxxxxx7947)	34	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
OFFICE DEPOT (xxxxxxx6119)	35	UNSECURED	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$946.65	\$0.00	\$0.00	\$0.00
OFFICE OF THE LABOR COMMISSIONER (xxxxxxx6152)	36	UNSECURED	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$4,027.48	\$0.00	\$0.00	\$0.00
OLEN RESIDENTIAL REALTY CORP (0993)	37	UNSECURED	U	50	\$0.00	\$0.00	\$0.00	\$4,933.28	\$6,406.00	\$0.00	\$0.00	\$0.00
PEOPLE'S CHOICE HOME LOAN INC (xxxxxxx5168)	38	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PROGRENS LANDSCAPING MANAGEMENT	39	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
RRCI (xxxxxxx1889)	40	UNSECURED	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$836.84	\$0.00	\$0.00	\$0.00
SANTANDER CONSUMER USA INC	42	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
SEARS/CBNA (xxxxxxx3675)	43	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
SOLUTIONS RECOVERY	44	UNSECURED	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$2,540.42	\$0.00	\$0.00	\$0.00
SPRINT (xxxxxxx4019)	45	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TIME PAYMENT CORP (xxxxxxx1212)	46	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
UDALL CPA GROUP (xxxxxxxD PC)	47	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
US BANK NA (xxxxxxx1999)	48	UNSECURED	U	50	\$0.00	\$0.00	\$0.00	\$2,968.46	\$2,860.00	\$0.00	\$0.00	\$0.00
HC RECOVERY INC (9622)	49	UNSECURED	U	50	\$0.00	\$0.00	\$0.00	\$13,086.85	\$13,086.85	\$0.00	\$0.00	\$0.00
Wells & Rawlings (3121)	50	UNSECURED	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$1,795.31	\$0.00	\$0.00	\$0.00
Wells Fargo Hm Mortgage (xxxxxxx9671)	51	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
KATHLEEN A. LEAVITT	52	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
R NATHAN GIBBS	53	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
UNITED STATES TREASURY (xxxxxxx2008)	56	IRS UNS	R	50	\$0.00	\$0.00	\$0.00	\$166,827.05	\$31,909.92	\$0.00	\$0.00	\$0.00
CENTURY LINK (2217)	60	UNSECURED	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$432.47	\$0.00	\$0.00	\$0.00
Elan Financial Service (0817)	61	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
SEVEN HILLS MASTER (nusa)	62	UNSECURED BY MATRIX	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
THISTLE CONSTRUCTION INC (382R)	63	UNSECURED	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$585.00	\$0.00	\$0.00	\$0.00
INTERNAL REVENUE SERVICE (8424)	67	UNSECURED	U	50	\$0.00	\$0.00	\$0.00	\$0.00	\$75,625.78	\$0.00	\$0.00	\$0.00

Attorney Listing

Name	Description	Level	Fee In Plan	Fee Paid Outside	Fee Paid to Date	Initial Amount	Monthly Payment	Fee Remaining
CHRISTOPHER P BURKE ESQ	ATTORNEY FEE	13	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
R NATHAN GIBBS LTD	PRIOR ATTORNEY	13	\$3,900.00	\$1,219.00	\$0.00	\$0.00	\$0.00	\$3,900.00

Clerk Fees Listing

No Clerk Names have been established for to this case.

Debtor Refund

Name	Description	Level	Refund Amount	Amount Paid	Amount Owed
ROBERT ALLAN GATLIN	DEBTOR REFUND	0	\$0.00	\$0.00	\$0.00

Claim Payout

Creditor Type	Cost	No Cost	SubTotal	Trustee	Total
Notice / Filing Fees					
Secured					
Secured Arrears					
Unsecured					
Priority	\$3,900.00		\$3,900.00	\$141.45	\$4,041.45
Attorney					
Continuing Debt Arrears					
Totals	\$3,900.00		\$3,900.00	\$141.45	\$4,041.45
Balance on Hand					\$22,429.14
Totals Less Balance on Hand					(\$18,387.69)
Continuing Payments	\$1,799.84		\$1,799.84	\$65.28	\$1,865.12
Regular Payments					

The balance disclosed on this page is not the payoff figure and does not represent the funds needed to pay the case in full. An audit must be completed by the Trustee's office to ascertain the actual payoff amount.