

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

CLERK, U.S. BANKRUPTCY COURT  
DISTRICT OF OREGON

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In re:

SOUTHERN PACIFIC FUNDING  
CORPORATION,

Debtor-in-Possession.

Tax ID #33-0636924

Case No. 398-37613-elp11

Chapter 11

LODGED \_\_\_\_\_  
PAID \_\_\_\_\_



**APPLICATION FOR FINAL  
ALLOWANCE OF COMPENSATION  
AND REIMBURSEMENT OF  
EXPENSES BY GRAY & END, L.L.P.,  
ATTORNEYS AT LAW**

Gray & End, L.L.P. (hereinafter "the applicant"), duly authorized as "collection attorneys" of the debtor, does hereby make its application for final approval of its compensation and reimbursement of its expenses and respectfully makes the follow representations:

1. That the applicant was retained by the debtor for purposes of providing the debtor with necessary collection-related legal services, including services in connection with real estate foreclosures, evictions and bankruptcies of borrowers under loans serviced by the debtor.

2. That the debtor was specifically authorized to employ the applicant pursuant to the court's order docketed herein on March 4, 1999 (hereinafter "the order") and the applicant is identified as one of the "collection attorneys" in exhibit A to the order.

**Drafted by:**

Jay J. Pitner  
Gray & End, L.L.P.  
600 North Broadway  
Milwaukee, WI 53202  
(414) 278-8060



3. That the applicant performed necessary collection-related legal services with respect to real estate foreclosures, evictions and bankruptcies of borrowers under loans serviced by the debtor subsequent to the order. A summary of the debtor's loans serviced by the applicant is attached hereto as exhibit A and copies of billings for those loans are attached hereto as exhibit B.

4. That pursuant to the terms of the order, the debtor was specifically authorized to pay its collection attorneys (including the applicant) certain amounts (as set forth in exhibit B to the order) without further notice or review. Subsequent to the entry of the order, the applicant has received such payments from the debtor. To the extent that any such payment from the debtor may not be in compliance with exhibit B of the order, the movant does hereby seek court approval of such payments.

5. That the applicant also seeks court approval of past payments made by the debtor for reasonable and customary fees and reimbursement of costs (as identified in the order as "non-scheduled payments").

6. That the applicant reserves its right to seek payment of compensation and reimbursement of expenses for those collection services which occur after August 23, 1999. In support of its reservation of rights in this regard, the applicant invites the court and all other interested parties to take note of the fact that a residential mortgage foreclosure action in Wisconsin can be completed in no less than nine (9) months. A number of the accounts referenced on exhibit A hereto are presently in the midst of the foreclosure process and additional fees and costs will be incurred in the future. It is the applicant's practice to submit billings to clients after the entry of a foreclosure judgment and then to submit a final billing when the foreclosure action is completed approximately seven (7) months thereafter. Accordingly, the applicant cannot state with any degree of certainty at the present time what the amount of the future final billings will be for each of the referenced accounts.

7. That this application is made pursuant to 11 U.S.C. §§327, 328, 330, 331, 503(b), or 1103 and Rule 2016 of the Federal Rules of Bankruptcy Procedure.

8. That the applicant has no agreement or understanding to share the compensation requested with any other person or persons other than the members of the applicant. The applicant further states that there has been no duplication of work by the applicant for which compensation is requested.

WHEREFORE, the applicant requests an order approving the debtor's disbursements for previous scheduled and non-scheduled payments by the debtor to the applicant for collection services, allowing the applicant compensation as set forth in exhibit A in the amount of \$5,882.50 for the balance due on accounts currently receiving collection services and allowing the applicant to supplement this application for compensation and costs incurred with respect to rendering collection services for those accounts in the future, all as costs and expenses of administration of the estate and such other amounts as the court may deem to be just and reasonable.

Dated this 19th day of August, 1999.

GRAY & END, L.L.P.  
Applicant

By: 

Jay J. Pitner

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Milwaukee, WI 53202

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