

IN THE UNITED STATE BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

FILED

JUN 22 1998

IN RE:

QUALICARE, INC.,

Debtor.

)
)
) 97-16891 BH
) Chapter 7

GRANT PRICE
CLERK, U.S. BANKRUPTCY COURT
WESTERN DISTRICT OF OKLAHOMA
BY , DEPUTY

APPLICATION FOR RENEWED AND CONTINUED ORDER LIMITING MAILING
AND NOTICE ON A CONTINUING BASIS AND TO TRUSTEE'S APPLICATION
AND MOTIONS TO EMPLOY RECORDS CLERK AND TO
PAY RENT EXPENSE PROFESSIONALS

COMES NOW, Lyle R. Nelson, duly appointed Trustee herein, and pursuant to Bankruptcy Rule 2003(m) and 9007 request that this Court issue its Order again limiting the parties to which the Trustee's latest pleadings, being an Application to employ records custodian, as well as an application to pay administrative rent expense must be served. In support of its Application, the Trustee would state as follows:

1. At this time, there are approximately 280 creditors, attorneys and parties in interest listed on the debtors mailing matrix. The vast majority of those creditors are prior employees. The vast majority of those employees are represent by Mr. John Laash, an attorney.

2. The Trustee is in the process of submitting several applications which surround the Trustee's protection of certain records of the estate from wholesale decimation by the FBI, U.S. Attorney's office, a third party benefits administrator, and possibly others. The Trustee anticipates that several pleadings will be served as part of that process. It is doubtful that most creditors and parties in interest are concerned with these issues.

3. As such, and with past history in this case as a guide, it would be extremely doubtful that any creditor would object to the Trustee's requests. However, the cost associated with serving the Applications and/or Motions to employ professional persons would exceed \$500.00 for the copies and mailing each time. This is not a de minimus cost to this Estate, and ultimately reduces the amount of money available for unsecured creditors, including prior employees.

4. Bankruptcy Rule 2003(m) and 9007 allows the Court, for good cause shown, to prescribe and hence limit notice of any matter. The Trustee has previously obtained an Order of the Court authorizing the Trustee to limit notice to all attorneys and parties who have entered an appearance,

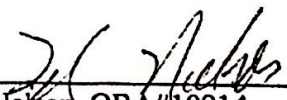
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and any governmental agencies. Again, one of the attorney's represents that vast majority of creditors in this case, being the prior employees.

5. It has been some time since that Order was entered. The Trustee wishes to request that this new Order, in form as attached hereto be entered allowing the Trustee to limit its notice and mailing to the aforementioned parties, to-wit: all attorneys of record, any parties who have entered an appearance, as well as any governmental agencies, with respect to the Trustee's various applications submitted contemporaneously with this Application, as well as to future motions and Orders, as well as consistent with the Court's prior order authorizing limited service.

WHEREFORE, premises considered, the Trustee respectfully requests that this Court issue its Order, in form as attached hereto, limiting the notice as to pleadings filed by the Trustee to the Debtor, Debtors counsel, counsel of record, any parties who have entered an appearance herein, and any governmental agencies.

Respectfully submitted,

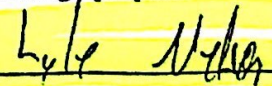


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ATTORNEY FOR TRUSTEE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was mailed to the parties on the attached matrix on June 23, 1998, by regular mail, postage prepaid.



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*** Chris Kluding left off mailing
matrix, despite NOA (Document 71)