

**FILED**

IN THE UNITED STATES BANKRUPTCY COURT MAY 16 2003  
FOR THE WESTERN DISTRICT OF OKLAHOMA

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

In Re: )  
)  
B & B WORM FARMS, INC., ) No. 03-14379-BH  
) (Chapter 7)  
Debtor. )

TRUSTEE'S APPLICATION TO AUTHORIZE PAYMENT OF  
ADMINISTRATIVE EXPENSES

Janice D. Loyd, Trustee herein, respectfully prays the Court issue an Order authorizing her to pay certain administrative expenses respecting the winding down of the debtor's business operation located in Sallisaw, Oklahoma, as well as document storage, pursuant to 11 U.S.C. § 503(b)(1). In support of said application, the Trustee would advise the Court of the following:

1. On April 22, 2003, B & B Worm Farms, Inc. filed for voluntary protection under Chapter 7 of the United States Bankruptcy Code.
2. On April 22, 2003, Janice D. Loyd was appointed as the Trustee to administer any assets of the bankruptcy estate.
3. Upon appointment as Trustee, Janice D. Loyd instituted an investigation into the business affairs and operations of the debtor estate. She discovered that the debtor operated a manure composting business in Sallisaw, Oklahoma. Through further investigation, the Trustee believes this business operation is a significant asset of the bankruptcy estate and should be preserved in an effort to liquidate same as an ongoing business.
4. The Trustee is in the process of soliciting bids for this operation as an ongoing business enterprise. In this regard, the Trustee is hopeful that an acceptable offer will be received within 60 days.

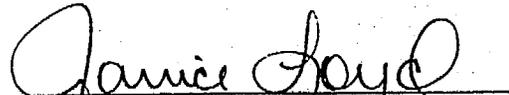
5. In the interim, the Trustee is requesting authority to pay certain administrative expenses necessary to preserve this valuable asset. These administrative expenses include the following:

- |    |   |          |
|----|---|----------|
| a. | Cookson Hills Electric Co-op<br>Outstanding indebtedness                              | \$535.91 |
| b. | TTI National, Inc. – Long-distance phone bill<br>Outstanding indebtedness             | \$ 23.23 |
| c. | AT&T – phone bill   | \$108.80 |
| d. | Johnny Winkler – maintenance and grounds<br>upkeep--recurring \$200.00 weekly expense |          |
| e. | Miscellaneous expenses not to exceed<br>\$1,000.00 per 30-day period                  |          |

6. The Trustee is requesting the authority to pay the outstanding bills set forth above in addition to the authority to keep the accounts current during the liquidation process of this business for a period not to exceed 90 days. The Trustee reserves the right to request an additional extension of time should the facts and circumstances warrant.

7. The Trustee is also in the process of gathering numerous business records of this debtor estate, and due to the volume of said documents, has leased office space for a records depository. The depository will be located in the First National Center, Suite 1234 West, Oklahoma City, Oklahoma at the rate of \$219.34 for the first month's rent covering the time from May 15 through June 15, 2003. Thereafter, the monthly rental will be \$109.67. The Trustee is requesting the Court authorize the payment of said rent on a monthly basis until such time as the space is no longer necessary for the administration in this bankruptcy estate.

WHEREFORE, the Trustee respectfully requests the Court authorize her to pay the administrative expenses set forth above, and for such other and further relief as is just and equitable.



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Of the Firm of  
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405/235-9371 Fax: 405/232-1003  
ATTORNEY FOR TRUSTEE

CERTIFICATE OF MAILING

This is to certify that a true and correct copy of the above and foregoing instrument was mailed, postage prepaid, this 16<sup>th</sup> day of May, 2003, to all parties in interest as listed on the matrix of the matter herein, said matrix being attached to the original document filed herein and to:

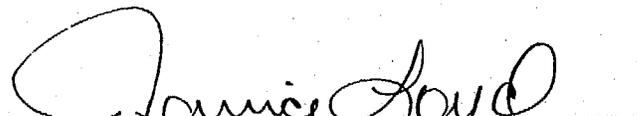
Johnny Winkler  
Growers Pride  
Rt 2 Box 94-B2  
Sallisaw OK 74955-9667

Raimey Charles, Leasing Agent  
First National Center, L.L.C.  
120 N. Robinson, Ste. 2601  
Oklahoma City OK 73102

A T & T  
P. O. Box 2969  
Omaha NE 74955-9667

TTI National, Inc.  
P. O. Box 96003  
Charlotte NC 28296-0003

Cookson Hills Electric Cooperative, Inc.  
P. O. Box 539  
Stigler OK 74462



JANICE D. LOYD