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5                   *Attorney for Eric M. Haley, Case Trustee*

6                   **IN THE UNITED STATES BANKRUPTCY COURT**  
7                   **FOR THE DISTRICT OF ARIZONA**

8                   In re:

9                   LAURA OWENS aka EMILY LAURA  
10                   WILSON,

11                   Debtor.

12                   (Chapter 7 Case)

13                   No. 2:25-bk-11801-BKM

14                   **TRUSTEE'S APPLICATION TO  
15                   EMPLOY ATTORNEY/  
16                   DECLARATION OF ATTORNEY**

17                   Eric M. Haley, ("Case Trustee"), for his Application to Employ Attorney, respectfully  
18                   alleges as follows:

19                   1.        This case was commenced by voluntary petition filed by the Debtor on December 8,  
20                   2025.

21                   2.        Case Trustee is the duly qualified and acting trustee in this case.

22                   3.        To perform the duties of a Case Trustee, Case Trustee requires the services of an  
23                   attorney for the following purpose:

24                   a.        To advise and consult with Case Trustee concerning questions arising in the conduct  
25                   of the administration of the estate and concerning Case Trustee's rights and remedies with  
26                   regard to the estate's assets and the claims of secured, preferred and unsecured creditors and  
27                   other parties in interest.

28                   b.        To appear for, prosecute, defend and represent Case Trustee's interest in suits arising  
29                   in or related to this case.

30                   c.        To investigate and prosecute preference and other actions arising under the Case  
31                   Trustee's avoiding powers.

32                   d.        To assist in the preparation of such pleadings, motions, notices and orders as are  
33                   required for the orderly administration of this estate; and to consult with and advise Case

1 Trustee in connection with the operation of or the termination of the operation of the  
2 business of the Debtor.

3 4. For the foregoing reasons and all other necessary and proper purposes, Case Trustee  
4 desires to retain generally the law firm of Nach, Rodgers, Hilkert & Santilli ("Attorney" or the  
5 "Firm") as counsel for Case Trustee.

6 5. Because Attorney practices in bankruptcy corporate reorganization, trustee and  
7 debtor/creditor matters, and because of its experience in those fields, Case Trustee feels that said  
8 law firm is well qualified to render the foregoing services.

9 6. Based upon the Declaration attached hereto, Case Trustee believes that said law firm  
10 and its members and associates, do not hold or represent any interest adverse to that of your Case  
11 Trustee or the Debtor or the estate and that said law firm is a disinterested entity within the meaning  
12 of 11 U.S.C. §101(14).

13 7. Case Trustee is informed that the normal billing rates of said law firm at this time are  
14 as follows:

15 Attorneys: \$575 - \$305 per hour

16 Paralegals: \$230 - \$35 per hour

17 8. Case Trustee is informed that the Firm does, from time to time, adjust its billing rates  
18 to reflect changes in attorney experience, adjust for inflation, and in light of prevailing billing rates  
19 industry wide. Any changes in rates will be set forth in any application for compensation.

20 9. It is contemplated that Attorney will seek compensation based upon normal and usual  
21 hourly billing rates. It is further contemplated that attorneys will seek interim compensation during  
22 the case as permitted by 11 U.S.C. §331.

23 10. Case Trustee brought this case to Attorney on the date indicated hereinafter. As a  
24 result, and in order to expeditiously handle the issues, Attorney immediately commenced work on  
25 the file. Attorney routinely copies the file and has an application to employ prepared for filing in  
26 due course. Therefore, Case Trustee seeks approval from the Court to employ the Firm from the  
27 date of such initial consultation.

WHEREFORE, Case Trustee prays as follows:

- a. For authority to employ Attorney, as of the date of this Application, as attorneys to render services in the areas described above with compensation to be paid as an administrative expense in such amounts as this Court may hereinafter determine; and,
- b. For such other and further relief as this Court deems just and proper.

b. For such other and further relief as this Court deems just and proper.

DATED: 12/30/2025

/s/ Eric M. Haley, Trustee  
Case Trustee

COPY of the foregoing mailed by 1<sup>st</sup> class mail:

Laura Owens  
11440 N 69th Street  
Scottsdale, AZ 85254  
*Debtor: Pro Se*

COPY of the foregoing delivered via electronic notification to:

Office of U.S. Trustee  
230 North First Avenue  
Phoenix, AZ 85003  
Email: [Jennifer.A.Giaimo@usdoj.gov](mailto:Jennifer.A.Giaimo@usdoj.gov)  
Email: [ustpregion14.px.ecf@usdoj.gov](mailto:ustpregion14.px.ecf@usdoj.gov)

By: /s/ *Becca Casteel*

## **DECLARATION OF STUART B. RODGERS**

I, Stuart B. Rodgers, declare:

A. I am an attorney duly admitted to practice before all courts of the State of Arizona, as well as this Court and the Court of Appeals for the Ninth Circuit.

B. I am a member of Nach, Rodgers, Hilkert & Santilli (“NRHS”), the law firm that Case Trustee is seeking to employ generally by the Application to which this Declaration is attached. I am a certified specialist in the practice of Bankruptcy Law. All of the members and non-member attorneys of NRHS are admitted to practice in this state and before this Court.

C. The members and non-member attorneys employed by the NRHS have extensive experience in bankruptcy, insolvency, corporate reorganization and debtor/creditor law. NRHS is well qualified to represent Case Trustee generally herein, and is willing to accept employment on the basis set forth in the annexed Application.

D. NRHS and its members and non-member attorneys do not hold any interest or connections to this estate, adverse or otherwise, or with the Debtor, creditors, or any other party-in-interest, their respective attorneys and accountants, the Case Trustee, or any person employed in the Office of the United States Trustee; and, NRHS is a disinterested entity as defined in 11 U.S.C. §101(14). Stuart B. Rodgers is the owner of Phoenix Noticing Services, LLC, d/b/a Bankruptcy Noticing Services which company might be requested by the Trustee to for printing/mailing. Bankruptcy Noticing Services provides printing and mailing to the Trustees for those items that used to be mailed out by BNC on behalf of the Trustees (primarily the Trustee's Notice of Final Reports) which are outside of normal legal services and beyond the scope of counsel. The costs/rates charged are competitive with similar services and are provided as an accommodation to the Trustees who must accommodate a large volume of mailings. It is unknown if the Trustee will utilize Bankruptcy Noticing Services at this time, but the disclosure is made for information purposes only.

E. Neither the undersigned nor NRHS have shared or agreed to share compensation in this case with anyone except as professional fees are normally divided among members of Nach, Rodgers, Hilkert & Santilli.

1 I declare under penalty of perjury that the foregoing is true and correct.  
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4 DATED: December 30, 2025  
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7 /s/ *Stuart B. Rodgers*  
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