

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF LOUISIANA

IN RE:

CASE NO: **23-12028**

**CARL CAVALIER**

SECTION: **A**

DEBTOR

CHAPTER **7**

**DEBTOR'S OBJECTION TO MOTION (I) TO AUTHORIZE TRUSTEE  
TO CONSUMMATE DEBTOR'S PREPETITION MEDIATED SETTLEMENT,  
AND (II) FOR APPROVAL OF THE COMPROMISE, ALLOWANCE, AND  
PAYMENT OF THE RELATED PREPETITION ATTORNEYS'  
CONTINGENCY FEE CLAIMS AGAINST THE ESTATE**

COMES NOW the debtor, Carl Cavalier, by and through his undersigned counsel, objects to the *Motion (I) To Authorize Trustee To Consummate Debtor's Prepetition Mediated Settlement, and (II) for Approval of the Compromise, Allowance, and Payment of the Related Prepetition Attorneys' Contingency Fee Claims Against the Estate* [Doc. 75] as follows:

1.

While the debtor has no objection to the consummation of the mediated settlement agreement referenced in the trustee's motion, he does object to the payment of a forty percent (40%) contingency fee.

2.

The debtor avers, believes and therefore alleges that no more than one-third (1/3) or \$66,666.67 ought to be paid as attorney's fees, plus reimbursement of all legitimate litigation expenses and court costs.

**WHEREFORE**, the debtor prays that his limited objection be sustained and that the attorney's fees to be paid to his previous counsel be limited to one-third (1/3) of the gross amounts of the mediated settlement.

Respectfully submitted,

/s/ Robert L. Marrero  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the above and foregoing *Debtor's Objection To Motion (I) To Authorize Trustee To Consummate Debtor's Prepetition Mediated Settlement, And (II) For Approval Of The Compromise, Allowance, And Payment Of The Related Prepetition Attorneys' Contingency Fee Claims Against The Estate* has been filed electronically with the Clerk of Court using the CM/ECF system and notice of this filing has been sent to all parties or counsel of record who have registered to receive electronic service by operation of the Court's electronic filing system.

Gretna, Louisiana this 3rd day of September, 2024.

**/s/ Robert L. Marrero**  
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