

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF LOUISIANA

IN RE:	§	CASE NO: 23-12028
	§	
CARL CAVALIER	§	CHAPTER 7
	§	
DEBTOR	§	SECTION A
	§	

**TRUSTEE’S REPLY TO DEBTOR’S OBJECTION
TO TRUSTEE’S RULE 9019 MOTION**

NOW INTO COURT, through undersigned counsel, comes Greta M. Brouphy, trustee of the captioned estate (the “Trustee”), who respectfully replies to the *Debtor’s Objection to the Trustee’s 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* (“Debtor’s Objection”) [ECF Doc. 77] as follows:

1. The Trustee first notes that because the Debtor does not object to Subpart I of the Trustee’s Motion that requests authority for the Trustee to consummate the Debtor’s prepetition mediated settlement, it which should be approved without objection.

2. The only part of the Trustee’s compromise motion that the Debtor indicates he objects to is Subpart II which seeks approval of the Trustee’s settlement of the claims of the Debtor’s two prepetition contingency fee attorneys. However, the Debtor’s Objection provides *no legal, nor factual* support for the objection. The only alleged basis the Debtor gives for his contention that this Court should reduce from 40% to 1/3 the two prepetition contractual contingency fee agreements he entered into with his two sets of attorneys is the following statement:

WHEREFORE the Trustee requests that the Court deny the Objection filed by the Debtor and grant the full relief requested in the Trustee’s Motion, including specifically without limitation, the approval of the settled quantum meruit contingency fee claims of the Debtor’s prepetition attorneys.

Dated: September 9, 2024.

Respectfully submitted,

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Certificate of Service

I certify that a copy of the foregoing *Trustee’s Reply To Debtor’s Objection To Trustee’s Rule 9019 Motion* was this day served via email through the Court’s electronic CM/ECF filing system on the parties participating in the Court’s CM/ECF system in this case as follows:

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Dated: September 9, 2024

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