## UNITED STATES BANKRUPTCY COURT DISTRICT OF NORTH DAKOTA

In re:	)	Case No. 13-30607
	)	Chapter 11 Bky.
J&J Oilfield Services, Inc.	)	
	)	
Debtor.	)	
	)	

## APPLICATION FOR APPROVAL OF EMPLOYMENT OF ATTORNEY

- The debtor filed a Chapter 11 bankruptcy petition on September 13, 2013.
   The debtor continues to operate as the debtor in possession. The debtor in possession makes this application through its president, Joseph J. Ottesen.
- 2. Applicant believes that the employment of an attorney is necessary to represent the chapter 11 debtor in this case. The attorney will assist the debtor in defining and performing its duties in this case. The attorney will provide advice to the debtor in possession as to the courses of action available and the impact upon the debtor. The attorney will act to implement the course of action chosen by the debtor in possession.
- 3. Kip M. Kaler of Kaler Doeling, PLLP is qualified by reason of practice and experience to render such representation or assistance. Attorney Kaler has represented debtors in possession, committees and creditors in several bankruptcy cases, and had experience in handling these cases. The applicant requests that the employment be effective the date of the bankruptcy filing, September 13, 2013.
- 4. The applicant requests that it be authorized to employ Kaler Doeling, PLLP as its attorney in these proceedings.
- 5. Proposed compensation and reimbursement of expenses is as follows: \$225 per hour plus all out-of-pocket expenses (which rate will increase in the near future based upon a planned rate increase) and lesser rates for less experienced attorneys, and \$80 per hour for paralegal work.

WHEREFORE, applicant prays that the Court approve such employment of Kip M. Kaler, and Kaler Doeling, PLLP, as the attorney for the debtor in possession, effective September 13, 2013.

Dated: 9-16-13.

J.J. Ottesen/President of J&J Oilfield Services, Inc.

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## **VERIFIED STATEMENT PURSUANT TO FEDERAL RULE 2014(a)**

I, Kip M. Kaler, of Kaler Doeling, PLLP, the professional named in the application for employment on behalf of the above named debtor, declare under penalty of perjury the following:

- 1. I do not hold or represent any interest adverse to the estate and am disinterested as required by 11 U.S.C. § 327.
- I do not have any connections to the debtor, creditors, any other party-in-interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the offices of the United States Trustee, except for the following: we have represented Joseph J. Ottesen, Annemie L. Ottesen, Ottesen Sand & Gravel, Inc., and M&M Aggregate in the state court proceeding by Union State Bank--these persons and entities are alleged to be liable on Union State Bank's debt, but the debtor in possession in the principal in the transaction. The Ottesen's will endeavor to obtain other counsel for their personal representation. To our knowledge we do not represent any other creditor of the debtor in possession at this time, and do not anticipate representing any creditor of the debtor in possession in any unrelated matter during this case.

3. Joseph J. Ottesen has agreed to deposit with this firm the sum of \$10,000 as security for payment of fees incurred in this bankruptcy case, although this firm will first seek to recover all fees and expenses from the debtor in possession.

Dated: 9-16-13

Kip M. Kaler

KALER DOELING, PLLP

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