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# UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

IN RE:	)	CASE NO.	15-64523-PWE
CLAUDIO PABLO AVENDANO,	)	CHAPTER	7
Debtor.	)		
	)		

### APPLICATION TO EMPLOY ACCOUNTANT

COMES NOW, Neil C. Gordon, duly appointed and acting Chapter 7 Trustee, and pursuant to 11 U.S.C. §327(a) shows the Court the following:

1.

Applicant is the duly qualified and acting Trustee in this case.

2.

Applicant wishes to employ the firm of STONEBRIDGE ACCOUNTING & FORENSICS LLC as Applicant's Accountants. Applicant shows that the firm of Stonebridge Accounting Strategies, Inc. is well qualified to perform the work required in this case and is experienced in the matters for which accounting and auditing services are required.

3.

The professional services, which the Accountant is to render, include:

a) Preparation of federal and state tax returns; preparation of all other financial documents required by federal and state law; all other work indicated by the accountant's analysis of the records of Debtor, and all other work necessary to assist the estate to comply with the reporting and accounting requirements of this Chapter 7 case.

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b) To review any claims filed by the Internal Revenue Service to determine the

validity of the amounts claimed.

c) Such other work as may be indicated by the Accountant's analysis of the

records of Debtor and the Estate.

4.

To the best of the Applicant's knowledge and belief the Accountant has no equity interest in and no connections with Debtor, his creditors, or any other party in interest, or their

attorneys and accountants. The Affidavit of the Accountant is attached hereto and made a

part hereof by reference.

5.

Applicant shows that the Accountant has agreed to perform the described services for a fee based upon an hourly charge of \$255.00 for these efforts.

Wherefore, Applicant prays that he be authorized to employ Stonebridge Accounting & Forensics LLC to perform the professional services required in connection with this case and on the terms stated.

This day of April, 2017.

Respectfully submitted,

ARNALL GOLDEN GREGORY LLP

/s/ Neil C. Gordon

Neil C. Gordon

Georgia Bar No. 302387

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Attorneys for Chapter 7 Trustee

## STATE OF GEORGIA COUNTY OF GWINNETT

Re: Claudro Pablo Avendeno, Debtor Case No. 15-64523 - PmB Chapter 7

### STATEMENT GIVEN UNDER BANKRUPTCY RULES 2014 AND 5002

Personally appeared before the undersigned officer duly authorized by law to administer oaths, SPENCE A. SHUMWAY, a member of the accounting firm of STONEBRIDGE ACCOUNTING & FORENSICS LLC, who after being duly sworn, on oath deposes and says:

- I am a member of the accounting firm of Stonebridge Accounting & Forensics LLC and I am a Certified Public Accountant duly admitted to practice in the State of Georgia, with offices in Grayson, Georgia.
- 2) To the best of my knowledge:
  - a) I am and every person in my firm is a "disinterested person," as defined by Section 101(14) of the Bankruptcy Code, regarding the aforementioned Debtor(s);
  - b) Neither I nor any member of this firm:
    - i. Holds or represents an interest adverse to this Estate.
    - Has had any business, professional, or other connections up to the date of this Affidavit with the aforementioned Debtor, creditors, or any other party in interest of which I am aware, and their respective attorneys and accountant, the United States Trustee,, and any persons employed by the United States Trustee, other than possible professional or social relationships or possible accounting or tax work on behalf of a different bankruptcy estate in which such counsel may have been involved or may have been the trustee; or
    - iii. Is related to any Judge of this Court, or so connected now or in the past with any Judge of this Court as to render such appointment improper.

FURTHER AFFIANT SAYETH NAUGHT.

STONEBRIDGE ACCOUNTING & FORENSICS LLC

Bv:

Spence A. S

Sworn to and Subscribed before me this day of

16

201

My Commission Expres:

Notary Public

### **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing Application to Employ Accountant upon each of the following:

Office of the United States Trustee 362 Richard B. Russell Bldg. 75 Ted Turner Drive, S.W. Atlanta, GA 30303

Spence A. Shumway, CPA Stonebridge Accounting & Forensics LLC P.O. Box 1290 Grayson, GA 30017

Claudio Pablo Avendano, Pro Se PO Box 401 Winston, GA 30187

by depositing a copy of the same in the United States Mail in an envelope properly

addressed with sufficient postage to assure delivery.

This \_\_\_\_ day of April, 2017

/s/ Neil C. Gordon

Neil C Gordon

Georgia Bar No. 302387 Arnall Golden Gregory LLP 171 17<sup>th</sup> Street, N.W., Suite 2100 Atlanta, Georgia 30363-1031 (404) 873-8596/neil.gordon@agg.com