

**IN THE UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

IN RE: ) **Chapter 11**  
 )  
SMALL LOANS, INC., et al<sup>1</sup> ) **Case No.: 11-12254 (WRS)**  
 )  
 )  
Debtor. )

**AGREED MOTION TO EXTEND TIME TO OBJECT  
TO FEE APPLICATION OF BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ**

Baker, Donelson, Bearman, Caldwell & Berkowitz ("Baker Donelson"), by and through undersigned counsel, hereby respectfully move the Court to Extend the Time for filing objections to the Baker Donelson fee application by the Trustee, the Committee, and the Bankruptcy Administrator to 5:00 p.m. prevailing Central Time on August 1, 2012. In support thereof, the parties state as follows:

1. Baker Donelson filed its fee app on June 26, 2012. *See* Doc. 459.
2. The Trustee filed a motion for approval of interim compensation procedures on June 20, 2012. *See* Doc. 394. The Court entered an order approving this motion on June 28, 2012. *See* Doc. 464. Pursuant to this motion, all parties have until July, 17 2012 to object to the Baker Donelson fee application. *See* Doc. 464.

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<sup>1</sup> The related Debtors along with the last four digits of each Debtors' federal tax identification number and respective case numbers are Small Loans, Inc. (3224) Case No. 11-12254, The Money Tree Inc. (1386) Case No. 11-12255, The Money Tree of Georgia Inc. (9228) Case No. 11-12258, The Money Tree of Florida Inc. (5315) Case No. 11-12257, and The Money Tree of Louisiana, Inc. (2592) Case No. 11-12256. Case information and the Debtors' respective addresses can be found at the dedicated website for these cases: <http://www.kccllc.net/SmallLoansInc>.

3. The Trustee and Baker Donelson have begun discussions aimed at a consensual resolution of potential objections to the Baker Donelson fee application, and believe that an extension of time for the Trustee to file an objection could lead to a resolution. Further, the extension could save the estate fees and expenses associated with the filing and prosecution of an objection if an agreed resolution is reached.

4. The Trustee, Baker Donelson, and the Bankruptcy Administrator have consulted and agree to the relief sought in this motion.

### **Relief Requested**

5. Through this motion, Baker Donelson requests that the Court extend the deadline to object to Baker Donelson's fee application for the Trustee, the Committee, and the Bankruptcy Administrator to August 1, 2012.

WHEREFORE, Baker Donelson respectfully requests that the Court grant the Motion to Extend the Time for filing objections to the Baker Donelson fee application for the Trustee, the Committee, and the Bankruptcy Administrator, and extend the time to file such objections until Wednesday August 1, 2012 at 5:00 prevailing Central time.

Respectfully submitted on this the 19th day of July, 2012.

/s/ Max A. Moseley

Max A. Moseley

Jan M. Hayden

Bill D. Bensinger

Attorneys for Debtors and Debtors-in-  
Possession, SMALL LOANS, INC., et al.

**OF COUNSEL:**

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served a copy of the foregoing pleading upon all those who have appeared and requested notice via the ECF system or by placing a copy of same in the United States mail, postage prepaid, addressed as follows on this the 19th day of July, 2012:

Teresa R. Jacobs  
U. S. Bankruptcy Administrator  
Frank M. Johnson, Jr. Federal Building  
One Church Street, Suite 103  
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John D. Elrod  
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/s/ Max A. Moseley

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Of Counsel