

**FILED**

OCT 10 2003

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

GRANT PRICE  
CLERK, U.S. BANKRUPTCY COURT  
WESTERN DISTRICT OF OKLAHOMA  
BY: \_\_\_\_\_ DEPUTY

In Re: )  
)  
B & B WORM FARMS, INC., )  
)  
Debtor. )

No. 03-14379-BH  
(Chapter 7)

TRUSTEE'S APPLICATION TO EMPLOY REAL ESTATE BROKER

Janice D. Loyd, Trustee in the above referenced bankruptcy proceeding, pursuant to § 327(a) of Title 11, United States Bankruptcy Code, makes application for authority to employ a real estate broker to list and market certain described real estate owned by the debtor estate in this proceeding. In support of this application, the Trustee respectfully represents to the Court as follows:

1. Pursuant to the provisions of § 327 of the Bankruptcy Code, the Trustee wishes to employ Reese Pilkington, Pilkington Real Estate, 1223 E. Cherokee, Ste. 12, Sallisaw, Oklahoma 74955, ("Pilkington"), an independent real estate broker and agent.

2. Among the assets which constitute property of the estate are three (3) tracts of property (the "property") located in Sallisaw, Oklahoma, more particularly described as follows:

**The S/2 NE/4 NE/4 of Section 3, Township 11 North, Range 23 East of the Indian Base and Meridian, LESS AND EXCEPT the following: Commencing at the NE corner of the S/2 of Lot 1; thence North 89 Degrees 44 Minutes 18 Seconds West 496.00 feet to the Point of Beginning; thence South 208.71 feet; thence North 89 Degrees 44 Minutes 18 Seconds east 208.71 feet to the Point of Beginning.**

**A tract of land in the NW/4 SW/4 SW/4 and the SW/4**

**NW/4 SW/4 in Section 4, Township 11 North, Range 23 East beginning at the SW corner of the NW/4 SW/4 SW/4 for the Point of Beginning; thence North 240 feet; thence East 16.5 feet; thence North 17 Degrees 43 Minutes 1 Second East 159.26 feet; thence North 1 Degree 41 Minutes 17 Seconds East 318.45 feet; thence North 74 Degrees 42 Minutes 31 seconds East 260 feet; thence South 784 feet to the south line of the NW/4 SW/4 Sw/4; thence West 330 feet to the Point of Beginning**

**A part of the S/2 NE/4 NE/4 Section 3, Township 11 North and Range 23 East of the Indian Base and Meridian, described as: Commencing at the NE corner of the S/2 of Lot 1; thence North 89 Degrees 44 Minutes 18 Seconds West 496.00 feet to a Point of Beginning; thence South 208.71 feet; thence North 89 degrees 44 Minutes 18 Seconds West 208.71 feet; thence North 208.71 feet; thence South 89 Degrees 44 Minutes 18 Seconds East 208.71 feet to the Point of Beginning**

3. The Trustee has selected Pilkington to list and market this property for the reason that it has considerable experience in the marketing of real property located in Sallisaw, Oklahoma, and is well qualified to provide the aforementioned services.

4. The Trustee proposes to employ Pilkington to provide the services on a 6 % commission fee basis plus reasonable costs incurred, subject to Court approval. The Trustee believes such an agreement to be in the best interest of the estate.

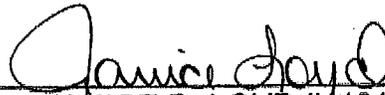
5. To the best of the Trustee's knowledge and belief: Pilkington is disinterested as that term is defined in § 101(13) of the Bankruptcy Code, and holds no interest adverse to or in connection with the debtors, creditors of the estate, and any other party in interest or their respective attorneys and accountants.

6. Pilkington is not bonded by the District Blanket Bond.

7. Pursuant to Rule 2014 of the Federal Rules of Bankruptcy Procedure,

this request may be made by application.

Upon these facts, the Trustee requests that this Court enter its Order authorizing employment of Pilkington to assist her or her attorneys in their duties described in 11 U.S.C. § 704(1), (2), and (4), and that she have such other and further relief as the Court deems just and equitable.



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of the Firm of  
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210 Park Avenue  
Oklahoma City OK 73102  
405/235-9371  
ATTORNEY FOR TRUSTEE

CERTIFICATE OF MAILING

This is to certify that a true and correct copy of the above and foregoing instrument was mailed, postage prepaid, this 10th day of October, 2003, to all parties in interest as listed on the matrix of the matter attached to the original document filed herein and to:

Pilkington Real Estate  
1223 E. Cherokee, Ste. 12  
Sallisaw OK 74955



JANICE D. LOYD

RECEIVED  
OKLAHOMA DEPT.  
OF SECURITIES

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