

JUN 06 2003

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA  
GRANT PRICE BANKRUPTCY COURT  
DISTRICT OF OKLAHOMA  
BY: \_\_\_\_\_, DEPUTY

In Re: )  
 )  
B & B WORM FARMS, INC., ) No. 03-14379-BH  
 ) (Chapter 7)  
Debtor. )

TRUSTEE'S APPLICATION TO EMPLOY  
RECOVERY AND LIQUIDATION AGENT

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 recovery and liquidation agent 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 Robert C. May d/b/a R. C. May & Associates ("May"), an independent investigative organization specializing in the recovery and liquidation of bankruptcy estate property.

2. Among the assets which constitute property of the estate is certain property (the "property"), more particularly described as follows:

2002 CHEVROLET TRAILBLAZER  
VIN 1GNDS13S822457572

3. The Trustee has selected May to recover and liquidate this property for the reason that it has considerable experience in matters of recovery and liquidation of bankruptcy estate property and is well qualified to provide the aforementioned services.

4. The Trustee proposes to employ May to provide the services on a scheduled fee basis as outlined:

- (a) Auction commission rate of 9% of gross sale
- (b) Flat rate recovery fee of \$150.00
- (C) Cost of advertising and reasonable expenses approved by the Trustee

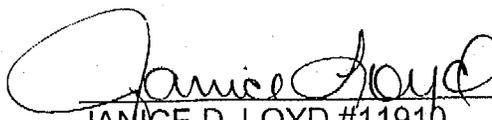
The Trustee believes such an agreement to be in the best interest of the estate.

5. To the best of the Trustee's knowledge and belief: May 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. May is bonded by the District Blanket Bond; said auctioneer does not currently hold any sale proceeds of the estate, nor does the Trustee expect the sale proceeds of said sale to exceed the value of the District 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 May 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.

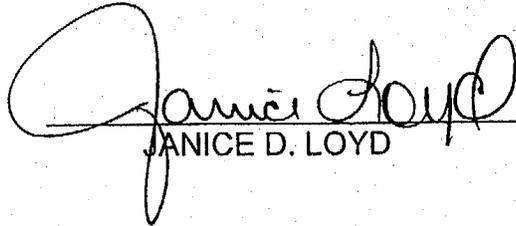


JANICE D. LOYD #11910  
Bellingham, Collins & Loyd, P.C.  
2050 Oklahoma Tower – 210 Park Avenue  
Oklahoma City OK 73102  
405/235-9371  
ATTORNEY FOR TRUSTEE

CERTIFICATE OF MAILING

This is to certify that a true and correct copy of the above and foregoing instrument was mailed, postage prepaid, this 6th day of June, 2003, to all parties listed on the matrix attached to the original document filed herein and to:

Mr. Rob May  
R. C. May & Associates, L.L.C.  
7101 N.W. Heidelberg Road  
Edmond OK 73003

  
JANICE D. LOYD