

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

In re:

BERNSTEIN FAMILY REALTY, LLC.,

Case No. 22-13009-EPK

Chapter 11

Debtor.

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**DEBTOR IN POSSESSION'S APPLICATION
FOR EMPLOYMENT OF ATTORNEY**

BERNSTEIN FAMILY REALTY, LLC, Debtor in Possession, respectfully requests an order of the court authorizing the employment of David Marshall Brown, Esq., of the law firm of DAVID MARSHALL BROWN, P.A. to represent the debtor in this case and states:

1. On April 19, 2022, an Involuntary Petition was filed against the Debtor under chapter 11 of the United States Bankruptcy Code.
2. The debtor desires to employ David Marshall Brown, Esq., and the Law Firm of DAVID MARSHALL BROWN, P.A. as attorneys in this case.
3. The debtor believes that the attorney is qualified to practice in this court and is qualified to advise the debtor on its relations with, and responsibilities to, the creditors and other interested parties.
4. The professional services the attorney will render are summarized as follows:
 - (a) To give advice to the Debtor with respect to its powers and duties as a Debtor in Possession and the continued management of its business

operations;

- (b) To advise the debtor with respect to its responsibilities in complying with the U.S. Trustee's Operating Guidelines and Reporting Requirements and with the rules of the Court;
- (c) To prepare motions, pleadings, orders, applications, adversary proceedings, and other legal documents necessary in the administration of the case;
- (d) To protect the interest of the debtor in all matters pending before the court;
- (e) To represent the debtor in negotiation with its creditors in the preparation of a plan.

5. To the best of the debtor's knowledge, neither said attorney nor said law firm have any connection with the creditors or other parties in interest or their respective attorneys. Neither said attorney nor said law firm represent any interest adverse to the debtor.

6. Attached to this motion is the proposed attorney's affidavit demonstrating that David Marshall Brown, Esq., and the Law Firm of DAVID MARSHALL BROWN, P.A., are disinterested as required by 11 U.S.C. §327(a) and a verified statement as required under Bankruptcy Rule 2014.

The debtor respectfully requests an order authorizing retention of David Marshall Brown, Esq., and the Law Firm of DAVID MARSHALL BROWN, P.A., on a general retainer, pursuant to 11 U.S.C. §§327 and 330.

I HEREBY CERTIFY that a copy of the foregoing was served upon all interested

CM/ECF Participants upon the filing of this document.

Daniel Bernstein, Member 6/3/2022

A handwritten signature in black ink, appearing to read "Daniel Bernstein". The signature is written in a cursive, flowing style with some capitalization and is positioned directly below the printed name and date.

CM/ECF Participants upon the filing of this document.

Jacob Bernstein, Member 06/03/2022

Jacob Bernstein

CM/ECF Participants upon the filing of this document.

Member: Joshua Bernstein

06/03/2022

A handwritten signature in black ink, appearing to read 'JB', is written over a horizontal line that extends from the text 'Member: Joshua Bernstein'.