

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA, FORT MYERS DIVISION

In Re:

ULRICH FELIX ANTON ENGLER

Case No. 9:08-bk-04360-MGW

Debtor.

APPLICATION TO EMPLOY EXPERT WITNESS

COMES NOW the Trustee, ROBERT E. TARDIF JR., and respectfully represents to the Court:

That because of the complicated nature a claim brought by the Trustee against Wells Fargo Bank, N.A., in the case styled Lesti v. Wells Fargo Bank N.A., the Trustee requests that the Court allow him to employ an expert to consult with Trustee's special counsel and to provide expert witness services and/or testimony in the above-referenced case. The Trustee suggests the Court authorize the employment of Catherine A. Ghiglieri, of Ghiglieri & Company, 2300 Cypress Point West, Austin, Texas 78746, and whose normal rates are as follows:

1. \$450.00 per hour for document review, research, analysis, telephone and office conferences, preparation for deposition and trial and travel.
2. \$550.00 per hour for testimony at a deposition.
3. \$550.00 per hour for testimony at a trial, with a four-hour minimum.

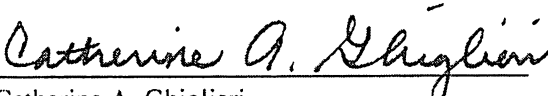
Pursuant to the Joint Prosecution Agreement previously entered into by the Trustee with the Court's permission, the expert's compensation will be shared between the plaintiffs in the lawsuit so the full compensation will not be borne solely by the estate. A true and accurate copy of the expert's curriculum vitae is attached to this application.

WHEREFORE the Trustee moves the Court to enter an Order authorizing the Trustee to employ the expert referenced above and to pay a reasonable fee for the services from the estate, subject to further application and order of this Court prior to payment of any fees.

Verified Statement

Catherine A. Ghiglieri, proposed expert/consultant for the Trustee, declares under penalty of perjury that I am rendering services subject to the Court's appointment for the Trustee in said cause, and that I have not and will not in any guise or form agree to share my compensation for such services with any person, except with persons who are members of Ghiglieri & Company. I have no connection with the debtor, creditors, or any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee.

Executed on May 9, 2013.


Catherine A. Ghiglieri

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished electronically to the Assistant United States Trustee, 501 E. Polk Street, Suite 1200, Tampa, Florida 33602 on 5/13/13.

/s/ Robert E. Tardif Jr.
Robert E. Tardif Jr., Trustee
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