

1 First Baptist Church of Thousand Oaks  
1250 Erbes Road, Thousand Oaks, CA 91362  
2 (805) 495-2531  
IN PRO PER

FILED  
U.S. BANKRUPTCY CT.  
INDIANAPOLIS DIVISION  
14 FEB 10 PM 2:17

3 UNITED STATES BANKRUPTCY COURT  
4 SOUTHERN DISTRICT OF INDIANA  
5 INDIANAPOLIS DIVISION

SOUTHERN DISTRICT  
OF INDIANA  
KEVIN P. DEMPSEY  
CLERK

7 MADISON PARK CHURCH OF GOD, INC.,  
d/b/a MADISON PARK CHURCH OF GOD

Case No. 13-07430-RLM-11

8 Debtor,

OBJECTION FOR ALLOWANCES OF FEES  
AND REIMBURSEMENT OF EXPENSES  
(APPLICATION) TO TAFT STETTINIUS &  
HOLLISTER LLP

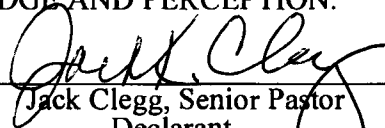
11  
12 1) First Baptist Church of Thousand Oaks, California (My Church) is a bond holder  
13 currently managed through Reliance Trust Company Indentured Trustee for First Mortgage Bonds,  
14 which is listed on Debtor's 08/15/2013 AMENDED SCHEDULE D - CREDITORS HOLDING  
15 SECURED CLAIMS.

16 2) Debtor's attorney of record (Taft Stettinius & Hollister LLP One Indiana Square,  
17 Suite 3500 Indianapolis, IN 46204) has already received from Debtor the sum of \$250,900.04  
18 between the dates of 07/20/2011 and 07/11/2013. This is a substantial amount of money. I believe  
19 that this money should have first gone to Creditors Holding Secured Claims.

20 3) I object to any funds being disbursed to any persons, natural or business/corporate,  
21 until first any and all funds are first disbursed to Creditors Holding Secured Claims.

22 I DECLARE, UNDER PENALTY OF PERJURY, THAT THE FOREGOING IS TRUE AND  
23 ACCURATE TO THE VERY BEST OF MY KNOWLEDGE AND PERCEPTION.

24 Dated: February 7, 2014

  
\_\_\_\_\_  
Jack Clegg, Senior Pastor  
Declarant

28 **OBJECTION TO REIMBURSEMENT**

ENVELOPE NOT PROVIDED  
 COPIES NOT PROVIDED

**DECLARATION OF SERVICE**

I am over the age of 18, not a party to the action and my business address is 1250 Erbes Road, Thousand Oaks, CA 91362.

On February 7, 2014, I served

**OBJECTION FOR ALLOWANCES OF FEES AND REIMBURSEMENT OF EXPENSES (APPLICATION) TO TAFT STETTINIUS & HOLLISTER LLP**

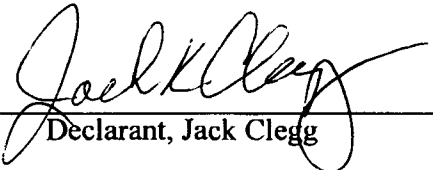
**BY MAIL:** I am readily familiar with our firm's practice of collection and processing correspondence for mailing. Under that practice, the documents or items served would be deposited with the U.S. Postal Service on the same day with the postage fully repaid at Thousand Oaks, California to the following address:

Office of the Clerk  
United States Bankruptcy Court  
Southern District of Indiana  
Birch Bayh Federal Building and United States Courthouse  
46 E. Ohio Street, Room 116  
Indianapolis, IN 46204

Jeffrey J. Graham  
Taft Stettinius & Hollister, LLP  
One Indiana Square, Ste 3500  
Indianapolis, IN 46204

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and accurate to the best of my knowledge.

Dated: February 7, 2014

  
Declarant, Jack Clegg