

ORIGINAL

Aberdeen, MS 39730-0867  
Telephone: 662-369-2596

RECEIVED  
MAR 22 2005

BY: \_\_\_\_\_

PLEASE TAKE NOTICE that a hearing will be held at  
Greenville Federal Building, Greenville, MS  
on 4/20/05 at 10:30 AM  
Responses Due: 4/18/05

RECEIVED-FPSC  
05 MAR 29 AM 9:55  
COMMISSION  
CLERK

to consider and act upon the following:

**18** – Application to Employ Attorneys and Disclosure of Compensation Craig Geno as Attorney for Debtor Filed by Craig M. Geno on behalf of Long Distance Billing Service, Inc. . (Entered on Docket by: Fields, Sylvia)

Should any party receiving this notice respond or object to said motion such response or objection is required to be filed with the Clerk of this court and served on the Attorney for Movant on or before said response due date. If any objection or response is filed, a hearing will be held on the above mentioned date; otherwise, the Court may consider said motion immediately after the objection or response due date.

A copy of the motion is required to be served pursuant to Rules 9013 and 9014, FRBkP. THE MOVING PARTY'S ATTORNEY IS REQUIRED BY THE STANDING ORDER ATTACHED HERETO TO PERFORM NOTICING AS TO SAID MOTION, THE NOTICE OF HEARING, AND THE OBJECTION DEADLINE, ACCORDING TO THE TERMS OF SAID STANDING ORDER.

CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR Dated: 3/21/05  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
RCA \_\_\_\_\_  
SCR \_\_\_\_\_  
SEC 1  
OTH Grant

Joseph Wroten  
Clerk, U.S. Bankruptcy Court  
BY: Sylvia Fields  
Deputy Clerk

DOCUMENT NUMBER-DATE  
03022 MAR 29 05  
FPSC-COMMISSION CLERK

**COPY**

**FILED**

2005 MAR 21 AM 9:56

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

CLERK  
U.S. BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI  
CHAPTER 11  
CASE NO. 05-11168

IN RE:  
LONG DISTANCE BILLING SERVICES INC.

**APPLICATION OF DEBTOR TO EMPLOY  
ATTORNEYS AND DISCLOSURE OF COMPENSATION**

COMES NOW Long Distance Billing Services, Inc., Debtor-in-possession, and files this its Application of Debtor to Employ Attorneys, and Disclosure of Compensation, and in support thereof, would show unto the Court the following, to-wit:

1. On February 22, 2005, the Debtor herein filed with this Court its original petition for reorganization under Chapter 11 of the Bankruptcy Code.
2. In order to facilitate the prudent performance of its duties and the successful operation of the business under this reorganization proceeding, it is necessary for the Debtor-in-possession to employ legal counsel. The professional services for which said attorneys will be retained to render shall include the following:
  - a. To advise and consult with the Debtor-in-possession regarding questions arising from certain contract negotiations which will occur during the operation of business by the Debtor-in-possession;
  - b. To evaluate and attack claims of various creditors who may assert security interests in the assets and who may seek to disturb the continued operation of the business.
  - c. To appear in, prosecute, or defend suits and proceedings, and to take all necessary and proper steps and other matters and things involved in or connected with the affairs of the estate of the Debtor;

or any other party-in-interest or their respective attorneys and accountants, or with the Office of the United States Trustee, or any employees of the Office of the United States Trustee, which are prohibited, which would interfere with or hinder the performance of counsel's duties herein, or which need to be described herein.

WHEREFORE, the Debtor requests that it be authorized to employ and appoint Harris & Geno as its attorneys and legal counsel, effective February 22, 2005. The Debtor further prays for such other and more general relief as the Court may deem just.

This, the 17<sup>th</sup> day of March, 2005.

Respectfully submitted,

LONG DISTANCE BILLING SERVICES, INC.

By Its Attorneys  
HARRIS & GENO, PLLC

By: Craig M. Geno  
Craig M. Geno

**OF COUNSEL:**

Craig M. Geno; MSB No. 4793  
Jeffrey K. Tyree; MSB No. 9049  
Melanie T. Vardaman; MSB No. 190392  
Harris & Geno, PLLC  
587 Highland Colony Parkway (39157)  
P. O. Box 3380  
Ridgeland, MS 39158-3380  
Telephone No.: 601-427-0048  
Facsimile No.: 601-427-0050

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- d. To represent the Debtor in court hearings and to assist in the preparation of contracts, reports, accounts, petitions, applications, orders and other papers and documents as may be necessary in this proceeding;
  - e. To advise and consult with Debtor in connection with any reorganization plan which may be proposed in this proceeding and any matters concerning Debtor which arise out of or follow the acceptance or consummation of such reorganization or its rejection; and
  - f. To perform such other legal services on behalf of Debtor as they become necessary in this proceeding.
3. Debtor desires to employ Harris & Geno, PLLC ("Harris & Geno") for the performance of these legal services. These attorneys, whose offices are in Ridgeland, Mississippi, are fully competent to advise the Debtor-in-possession on all matters which are anticipated to arise in the functioning of this case and to protect and preserve all rights of the Debtor and the interests of creditors. The Debtor desires to employ said attorneys at the following hourly rates, plus expenses: Craig M. Geno at \$250; Jeffrey K. Tyree at \$200.00; Melanie T. Vardaman at \$175.00; Paralegals/Legal Assistants at \$85.00. The Debtor has caused Harris & Geno to be paid a retainer of \$16,000.00 (less pre-petition time), including filing fee, to be applied to fees and expenses in this case.

Harris & Geno will bill at the rates set forth herein, and if necessary, submit requests for compensation to the Court for approval.

4. Harris & Geno is now counsel for the Debtor, and as represented in the Affidavit of Craig M. Geno attached hereto as Exhibit "A", Harris & Geno represents no interests adverse to the Debtor or the estate and matters upon which it is to be engaged and its employment would be in the best interest of this estate. To the best of Debtor's knowledge, Harris & Geno has no connections with the creditors herein

**CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have this date mailed, postage prepaid, a true and correct copy of the above and foregoing to the following:

Sammye S. Sharp, Esq.  
Office of the United States Trustee  
Suite 706, A. H. McCoy Federal Building  
100 West Capitol Street  
Jackson, MS 39269

THIS, the 17<sup>th</sup> day of March, 2005.

Craig M. Geno  
Craig M. Geno

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

IN RE:  
LONG DISTANCE BILLING SERVICES INC.

CHAPTER 11  
CASE NO. 05-11168

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

IN RE:  
LONG DISTANCE BILLING SERVICES INC.

CHAPTER 11  
CASE NO. 05-11168

AFFIDAVIT

PERSONALLY APPEARED BEFORE ME, the undersigned authority, in and for the jurisdiction aforesaid, Craig M. Geno (the "Affiant") of Harris & Geno, PLLC ("the firm"), attorneys for the Debtor, who after having been by me first duly sworn, stated on oath that this Affidavit is filed herein in support of the Debtor's Application to Employ Attorneys, and Disclosure of Compensation, that the firm now represents the Debtor, it represents no interests adverse to the Debtor or the estate and matters upon which it is to be engaged, and its employment would be in the best interest of this estate. To the best of Affiant's knowledge, the firm has no connections with the creditors herein or any other party-in-interest or their respective attorneys and accountants, or with the office of the U. S. Trustee, or any employees thereof, which are prohibited, which would interfere with or hinder the performance of counsel's duties herein, or which need to be described herein. A filant hereby makes application for the employment of the firm as attorneys and legal counsel for the Debtor.


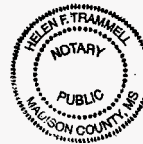
  
CRAIG M. GENO

EXHIBIT "A"

STATE OF MISSISSIPPI  
COUNTY OF MADISON

SWORN TO AND SUBSCRIBED BEFORE ME, this the 17th day of March, 2005.



  
NOTARY PUBLIC

MY COMMISSION EXPIRES 5-30-07