

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

In re: )  
RANDA M. ALGHUSSAIN, ) Bankruptcy Case  
Debtor. ) No. 19-10800-KHK  
 ) Chapter 7  
 )

**APPLICATION TO EMPLOY COUNSEL TO THE TRUSTEE**

Comes now, H. Jason Gold, the Chapter 7 Trustee ("Trustee") in the above captioned matter and files this Application to Employ Counsel to the Trustee, effective as of the Trustee's appointment in this case, pursuant to 11 U.S.C. § 327, and states to the Court as follows:

1. On March 14, 2019, Randa M. Alghussain ("Debtor") filed a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code (the "Bankruptcy Code"). On May 10, 2019 the case was converted to Chapter 7. H. Jason Gold was appointed Chapter 7 Trustee.

2. The Trustee wishes to employ the law firm of Nelson Mullins Riley & Scarborough LLP as counsel to the Trustee to represent him in connection with the sale or other disposition of real property owned by the Debtor, as well as other matters that may require the services of Counsel in this case.

3. Nelson Mullins will assist the Trustee with the sale or other disposition of real property owned by the Debtor and located at 2531 Herrell Court, Falls Church, Virginia 22043 (the "Property"). Subject to paragraph 4 below, Nelson Mullins will represent the Trustee with respect to legal work necessary to effectuate the sale. The services will include representing the

H. Jason Gold, Va. Bar No. 19117  
David M. Barnes, Jr., Va. Bar No. 86747  
NELSON MULLINS RILEY & SCARBOROUGH LLP  
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(202) 689-2800  
Counsel to the Chapter 7 Trustee

Trustee in connection with drafting the necessary sale motion and attending any hearings relating to the sale, and any other services necessary to effectuate the sale of the Property. Nelson Mullins may assist the Trustee with respect to other matters as required from time to time. The Trustee recognizes that parties in interest, including the United States Trustee, reserve their rights with respect to any potential objection to any application for compensation filed in connection with this application.

4. As set forth in the accompanying verified statement, Nelson Mullins currently represents certain creditors of the Debtor in matters wholly unrelated to this case. The Trustee does not seek to employ Nelson Mullins in any capacity that would require the firm to take actions adverse to any creditors it currently represents. To the extent the Trustee determines that he requires counsel to represent him in matters adverse to any creditors which are current clients of Nelson Mullins, he will seek to employ separate counsel for that specific purpose. Accordingly, the Trustee submits that the employment of Nelson Mullins is appropriate and consistent with section 327(c) of the Bankruptcy Code.

5. The names and current hourly billing rates of Nelson Mullins' professionals and paraprofessionals expected to be most actively involved in this case are set out below. The hourly rates set forth herein are below the standard hourly rate of each professional. These rates are subject to approval of the Court and may also be subject to periodic increases in the normal course of business.

<u>Professional</u>	<u>Hourly Rate</u>
H. Jason Gold Partner	\$580.00/hour
Dylan G. Trache Partner	\$580.00/hour
David M. Barnes, Jr. Associate	\$385.00/hour
Robert W. Ours Senior Paralegal	\$215.00/hour

6. To the best of the Trustee's knowledge, information and belief, Nelson Mullins does not have any connection with the Debtor, creditors, or any other party in interest herein, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee, other than representing the parties in matters wholly unrelated to this case, as set forth in the attached verified statement.

7. To the best of the Trustee's knowledge, information and belief, Nelson Mullins does not hold or represent any interest adverse to the bankruptcy estate. A verified statement executed on behalf of Nelson Mullins in accordance with the provisions of 11 U.S.C. § 327 and Fed. R. Bankr. P. 2014 is attached hereto.

8. It is in the best interest of the Debtor's estate, the creditors and parties in interest to authorize the employment of Nelson Mullins.

WHEREFORE, the Trustee respectfully requests that he be authorized to employ and retain Nelson Mullins Riley & Scarborough LLP to represent him for the purposes set forth herein.

Respectfully submitted,

H. JASON GOLD, TRUSTEE

By Counsel

NELSON MULLINS RILEY & SCARBOROUGH LLP  
101 Constitution Avenue, NW / Suite 900  
Washington, DC 20001  
Tel: 202.689.2800  
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By: /s/ David M. Barnes, Jr.  
H. Jason Gold, Va. Bar No. 19117  
David M. Barnes, Jr., Va. Bar No. 86747

*Counsel to the Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 6<sup>th</sup> day of September 2019, the foregoing Application was served by first class mail, postage prepaid, to:

Office of the United States Trustee  
1725 Duke Street, Suite 650  
Alexandria, VA 22314

Robert R. Weed  
Law Offices of Robert Weed  
1376 Old Bridge Road, Suite 101-4  
Woodbridge, VA 22192

/s/ David M. Barnes, Jr.  
David M. Barnes, Jr.