

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:**

**Garden Oaks Maintenance Organization,  
Inc.**

**DEBTOR**

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CASE NO. 18-60018

**DECLARATION OF WALKER & PATTERSON, P.C. PURSUANT  
TO 11 U.S.C. § 327 AND FED. R. BANKR. P. 2016**

Pursuant to Bankruptcy Code Section 327 and Bankruptcy Rule 2016, Walker & Patterson, P.C. (the “*Firm*”) states as follows:

1. I am an attorney at law duly licensed to practice in the State of Texas. I am also admitted to practice in this Court. I am a partner in the law firm of Walker & Patterson, P.C. (“W&P”) which maintains its offices at 4815 Dacoma, Houston, Texas 77092 and am authorized to make this declaration for the purpose of fulfilling the disclosure requirements of Fed. R. Bankr. P. 2014(a).
2. W&P is a Houston-based law firm. W&P has considerable expertise in bankruptcy, insolvency and commercial and business litigation, and is qualified to represent the Debtor in this case.
3. To the best of my knowledge, information and belief, formed after due inquiry, W&P has no known relationship with the Debtor, its creditors, other parties in interest, their respective attorneys and accountants, the United States Trustee or any person employed by the Office of the United States Trustee.
4. Except as set forth above, W&P has no other known connection with the Debtor, its creditors, any other parties-in-interest, its respective attorneys and accountants, the United States Trustee or any person employed in the office of the United States Trustee and is a “disinterested person” within the definition of Section 101(14) of the Bankruptcy Code.
5. Subject to the approval of this Court, W&P will charge the Debtor for its legal services on an hourly basis in accordance with its ordinary and customary rates. All attorneys and paraprofessionals employed by W&P are assigned hourly billing rates that are adjusted periodically and may change during the course of W&P’s employment in this case. Any

adjustments will be reflected in the monthly statement for the month following the date of such adjustment. W&P's current hourly rates are as follows:

Category of Service Provider Low/High

Partners \$400.00/\$350.00

Associates/Staff Attorneys \$325.00

Legal Assistants/Law Clerks \$100.00

The rate of each professional will be clearly reflected in W&P's monthly invoice(s) and billed in six minute increments as required in the Southern District of Texas. W&P will maintain detailed records of time spent by professionals and their respective activities.

6. Disbursements for expenses are not included in W&P's hourly rates and will be separately billed as expenses of this proposed engagement. Such disbursements for expenses shall include, without limitation, charges for photocopying, courier services, document retrieval costs, printing, computer-assisted legal research (Westlaw/Lexis), postage, long distance, telecopier, deposition fees, filing fees, witness fees, subpoena fees, parking fees, tolls, travel expenses (including mileage), and any fees for outside contract services. In certain cases, charges are set by the service providers or outside contractors and in other cases.
7. Prior to the filing of these cases, W&P received a retainer of \$50,000.00 from Garden Oaks Maintenance Organization, Inc. as security for payment of services to be rendered. This amount has been reduced by W&P's pre-petition fees and expenses, including the filing fee for this case. The balance of the retainer was \$40,003.00 as of the petition date. Walker & Patterson was paid \$9,997.00 for current billings in March and April, 2018, which included the filing fee of \$1,717.00.
8. No agreement or understanding exists between W&P and any other person (other than members of the firm) for the sharing of compensation received for services to be rendered in connection with this representation.
9. W&P reserves the right to amend and/or supplement this Declaration and the disclosures herein.

**I declare under penalties of perjury that the foregoing is true and correct.**

**Dated: April 18, 2018.**

/s/Johnie Patterson  
Johnie Patterson