## **BANKRUPTCY** UPDATE October 19, 2022

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## **CLN Decision**

You can use the link in the "Links" section below to view the following decision:

## In re Menge

**Issue:** Whether the debtor's attorney's flat fee for postpetition services in this chapter 7 bifurcated fee bankruptcy case comported with the tenets of *In re Quigley*, Bankr. No. 21-40170, slip op. (Bankr. D.S.D. Feb. 9, 2022), and was reasonable?

**Ruling:** No. The attorney failed to demonstrate his flat fee for post-petition services reflected the required services the attorney still needed to perform and the additional reasonably anticipated services this particular debtor would also need.

## Links

In re Menge

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