

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF WYOMING**

**IN RE:**

**CASE NO. 21-20392**

**WASATCH RAILROAD CONTRACTORS**

**Debtor**

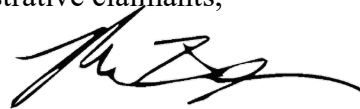
**CHAPTER 11**

**OBJECTION TO MOTION TO DISMISS**

As the court-appointed Subchapter V trustee in this proceeding (Docket 8), I object to the Debtor's January 3, 2021 Motion to Dismiss (Docket 124) because no provision has been made by the debtor to resolve my outstanding administrative fees, in whole or in part. Since my appointment, I have been carrying out my statutory §1183 duties, including appearances at hearings and facilitating a plan of reorganization by interfacing with the debtor and its creditors. I have incurred fees of approximately \$4,000.00 and will shortly be filing my fee application. In response to my request for a resolution of outstanding Subchapter V trustee fees in connection with the dismissal, the debtor, via counsel, has indicated that no funds are available to pay Subchapter V trustee fees. I object to dismissal until an accounting of available unencumbered assets is provided and a fair and equitable distribution of any such assets is proposed. To the extent that total administrative claims exceed available assets, Subchapter V trustee fees should be paid in at least the same proportion as all other administrative claimants,

Dated: **01.21.2022**

/s/



Mark D Dennis, CPA  
SL Biggs, A Division of SingerLewak LLP  
2000 So. Colorado Blvd., Suite 200  
Denver, CO 80222  
Ph: (303) 226 5471  
[mdennis@slbiggs.com](mailto:mdennis@slbiggs.com)