

COMMERCIAL LAW & BANKRUPTCY SECTION NEWSLETTER IDAHO STATE BAR - JUNE 2018



CONTENTS

PAGE 2... 2018 IDAHO LEGISLATIVE ACTIONS *by Steve Taggart*

PAGE 4... IN RE HIRSCH: FACTORING OF FEES FORECLOSED FOR NOW IN
THE BANKRUPTCY COURT FOR THE DISTRICT OF IDAHO *by Brent
R. Wilson*

PAGE 6... HON. JIM D. PAPPAS, U.S. BANKRUPTCY JUDGE, DISTRICT OF
IDAHO *by Ron Kerl*

2018 LEGISLATIVE ACTIONS

Steve Taggart

The 2018 Idaho Legislature was heavily shaped by this year's election season and the just completed high-spending primary. There were several bills passed (and signed by Governor Otter) that will have varying degrees of impact on the practice of civil law in Idaho. Here are the ones I believe are most impactful.

H0357 – Changes time to file answer for small claims actions to 21 days

This measure modifies the answer period for Idaho small claims actions from 20 days to 21 days. This is part of the effort by the Idaho Courts to create consistency in filing and servicing requirements using 7-day increments. Expect to see similar modifications in the future in other areas.

HB0359 – Notices required to file forcible detainer action

Unlawful detainer actions are brought when a tenant fails to pay rent, violates a lease, engages in criminal behavior or holds over. Generally speaking, to file an unlawful detainer action, the plaintiff must first provide the tenant a 3-day. Forcible detainer actions are brought against squatters who have no right to be on the property. Currently, I.C. § 6-310(3)(e) requires that "notices required by law have been served" before filing a forcible detainer complaint when the statute only requires that demand be made to surrender the premises and the squatter refuses to surrender. This legislation modifies I.C. § 6-310(3)(e) to require only that demand has been made and surrender refused by the squatter.

H0361 – Secretary of State filing fees and effective launch of electronic filing

Eliminates fee for filing Statement of Termination for a partnership and applies a \$20 fee for documents that must be manually entered and setting an effective date of October 31, 2018 for the Secretary of State's electronic filing system. The Idaho Secretary State is moving to online filing of most documents and this is part of that effort.

H0379 – Allows only a single nonprofit incorporator to sign articles of incorporation

Current law requires all incorporators of a nonprofit corporation to sign the articles of incorporation filed with the Idaho Secretary of State. This law will allow only a single incorporator to sign.

H0405 – Repeal of Unfair Sales Act

During the Great Depression, in 1939, Idaho passed the

Unfair Sales Act, today Chapter 4, Title 48, Idaho Code. It generally requires merchandise to be marked up by a statutorily set minimum. Many merchandisers today sell below cost and such benefits consumers. The Unfair Sales Act is generally not enforced but does provide for criminal penalties.

H0446 – Modifies requirements for notaries

The bill requires notary stamps to include a serrated or milled-edge border in a rectangular or circular form. Current law requires notary stamps to include: 1) the notary public's name, 2) the words "Notary Public", 3) the words "State of Idaho" and 4) the notary's Idaho commission number. The measures also allows for electronic stamps to be applied to electronic records. Idaho recently modified its notary law to allow notarization of electronic records.

H0452 – Clarified that Idaho jurisdictions cannot prohibit short-term rentals

Last year the Idaho Legislature restricted the ability of Idaho's cities and counties to restrict short-term rentals, which have exploded in popularity. The 2017 measure allowed reasonable regulations to protect the public's health, safety and general welfare. Some communities have used ambiguity in the language to put in place complete bans. This year's measure prohibits flat-out bans.

H0466 – Exempts family members and children working in a family business from minimum wage requirements

Idaho currently exempts family members and children from the minimum wage when working on the family farm. This measure extends that exemption to working in a family business.

H0526 – Restricts farm equipment suppliers from changing their agreement with a dealer

Requires good cause before a supplier changes the agreement with their dealer that will result in a substantial change in competitive circumstances.

H0535 – Allows sheriff sales to be conducted online

Current language seems to require all sheriff sales of personal and real property to be conducted in person. This legislation removes the requirement of live sales to allow for online auctions.

H0547a – Restricts local governments from adopting building codes above those adopted by the Idaho Building Code Board

After extensive back-and-forth in the legislative session, the Legislature revised Idaho's building code system from

one where the Idaho Building Code Board set minimum standards to one where they set maximum requirements, except in limited circumstances.

H0606 and H0611 – Open Public Meetings Law amendments

The Governor has created 28 public agencies by executive order. H0606 applies the requirements to the Open Public Meetings Law to them. H0611 requires a government agency to posts agendas online if they have an online presence and specify which items it may take action on.

H0642 – New requirements for HOAs

Under this legislation a HOA member or their agent can request a statement of account, which must be provided within a reasonable time. Also, the HOA must disclose transfer fees.

H0658a – Idaho trespassing standards modified

This is a dramatic and fairly controversial re-write of Idaho’s laws governing trespassing which modifies what constitutes trespassing and penalties.

S1255 – Modification of process to renew civil judgments

This modifies current law to renew a judgment by shifting from the use of “renewal of judgment” to an “order renewing judgment”. The purpose is to avoid confusion over priority.

S1277 – Modification to small lawsuit criteria

Increases the dollar amount for small lawsuits (not small claims actions) from \$25,000 to \$35,000. Impacts process used for mediation and entitlement to attorney’s fees.

S1287a – Covenants not to compete

Modifies existing rebuttal presumptions under Idaho law as to validity of covenants not to compete.

S1316a – Attorney’s fees in disputes before Idaho licensing authorities

Idaho has numerous licensing entities that govern a wide array of professions. This measure allows licensees to obtain attorney’s fees for actions brought against them by the applicable licensing agency and also allows obtaining judicial review of fee awards.

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LAWYER HUMOR

A lawyer dies and goes to Heaven.

“There must be some mistake,” the lawyer argues. “I’m too young to die. I’m only 55.”

“Fifty-five?” says Saint Peter. “No, according to our calculations, you’re 82.”

“How’d you get that?” the lawyer asks.

Answers St. Peter, “We added up your time sheets.”

IN RE HIRSCH: FACTORING OF FEES FORECLOSED FOR NOW IN THE BANKRUPTCY COURT FOR THE DISTRICT OF IDAHO

Brent R. Wilson

In the November 2017 Commercial Law & Bankruptcy Section Newsletter, the case of *In re Grimmert*, No. 16-01094-JDP, 2017 WL 2437231 (Bankr. D. Idaho June 5, 2017) was aptly reviewed by Bob Faucher, Matt Christensen, and Kelly McConnell. This Article builds on the *In re Grimmert* discussion of unbundling of attorney services and highlights a related issue—one referenced in *In re Grimmert*—of whether factoring of attorney fees in bankruptcy is appropriate. The issue was before the Court in *In re Hirsch*, 17-40179-JDP.

I. *In re Grimmert* Revisited: Unbundling of Attorney Services

Before discussing the issue of factoring of attorney fees in bankruptcy, a refresher as to the facts and holding of *In re Grimmert* may be helpful. *In re Grimmert* involved the issue of whether unbundling of bankruptcy services by the debtor's counsel is allowed. In that case, counsel's engagement agreement with the debtor involved payment of a prepetition amount and provided for future payments from the debtor for the attorney's work after filing the bankruptcy case. As noted by the Court, the engagement agreement provided that counsel's work postpetition was substantially all the work that would be required for the debtor to obtain her discharge.

The Court concluded that the engagement agreement was an improper attempt to limit counsel's representation in the bankruptcy case such that counsel avoided, if he was not paid, the "fundamental and core obligations" required of counsel representing a debtor in chapter 7 case in the District of Idaho. *Id.* at *5-6 (quoting *In re Castorena*, 270 B.R. 504 (Bankr. D. Idaho 2001)). The Court further ruled that the postpetition fees—arising from a prepetition contract with the debtor—were discharged in the bankruptcy case, counsel's efforts to collect the fees during the bankruptcy case violated the automatic stay, and such collection efforts and claims by counsel created a conflict of interest between counsel and the debtor, among other things. *In re Grimmert*, 2017 WL 2437231, at *9-12.

On February 16, 2018, Judge Edward Lodge affirmed in all respects the decision of the Bankruptcy Court. *See In re Grimmert*, Case No. 1:17-cv-00266-EJL, Dkt. No. 16. In summary, the District Court stated: "Appellant forfeited any right to professional fees by failing to provide reasonable legal services consistent with the bankruptcy

code, bankruptcy rules, court orders, and local rules. These failures include both acts of omission and commission. Appellant failed to provide all of the legal services required consistent with the bankruptcy code, rules, and local rules. In addition, Appellant engaged in aggressive debt collection practices that are contrary to the letter and spirit of these same rules." *Id.* at 2.

Referenced within the *In re Grimmert* decision at the Bankruptcy Court level is the issue pertinent to this Article: the engagement agreement "provided Debtor's consent for a company known as 'BK Billing' to collect fees from Debtor pursuant to a factoring loan agreement that company apparently had with Counsel." *Id.* at *3. The Court noted that there was no evidence that counsel did, in fact, assign the debtor's account to the factoring company, leaving that issue for another day. *Id.* at *3 n.6.

II. *In re Hirsch*: Factoring of Attorney Fees

In contrast to *In re Grimmert*, "BK Billing" was indeed assigned the debtors' account in *In re Hirsch*, thus bringing the factoring issue mentioned in *In re Grimmert* before the Court. As a bit of background, "[f]actoring" is "the buying of accounts receivable at a discount. The price is discounted because the factor (who buys them) assumes the risk of delay in collection and loss on the accounts receivable." *Black's Law Dictionary* (7th ed. 1999). In *In re Hirsch* counsel sold (*i.e.* factored) its account receivable of attorney fees to be received from the debtors postpetition to BK Billing.

After learning of the factoring arrangement from the debtor at the § 341 Meeting, the U.S. Trustee brought a motion to cancel the engagement agreement with counsel and to require counsel to return the fees received. *In re Hirsch*, 17-40179-JDP, Dkt. No. 27. The U.S. Trustee argued in its motion that the fee agreement should be cancelled because it was not adequately explained to the debtors, sufficiently to obtain the debtors' informed consent: "that their fee agreement for post-petition payment is subject to the automatic stay and discharge injunction, and that [the firm] can be paid for post-petition services under quantum meruit [Moreover, counsel] has not explained in any filing with the Court in this case what or who BK Billing is and the fee sharing relationship of [counsel] and BK Billing." *Id.* at 4. The U.S. Trustee set the motion for a hearing. At the hearing, counsel and the U.S. Trustee reported that they had entered into a stipulation regarding the motion, removing the need for an evidentiary hearing. *See* Dkt. No. 50.

A. Stipulation Terms

The Stipulation was filed after the hearing as promised by the parties. Dkt. No. 52. The Stipulation confirmed

that counsel did indeed factor the account receivable of the debtors to BK Billing. *Id.* at ¶ 10. The Stipulation reported that counsel's agreement with the debtors involved the debtors committing to pay \$240 every four weeks, until \$2,400 was paid, as an automatic deduction from the debtor's account, which stream of future funds was sold to BK Billing. *Id.* at ¶¶ 11 and 14. It was not clear from the Stipulation, but implied therein, that counsel did not inform the debtors of BK Billing and that company's involvement. In addition to the payments mentioned above, the debtors also agreed to pay a fee of \$100 per month "to keep the file open," according to the Stipulation. *Id.* at ¶ 14.

Among other things, the U.S. Trustee and counsel agreed in the Stipulation, based upon the above facts, that the agreement allowing direct withdrawal of funds from the debtors' accounts is subject to the automatic stay and discharge injunction, as provided by *American Law Center PC v. Stanley (In re Jastrem)*, 253 F.3d 438 (9th Cir. 2001); *Gordon v. Hines (In re Hines)*, 147 F.3d 1185 (9th Cir. 1988); and *Hessinger & Assoc. v. U.S. Trustee (In re Biggar)*, 110 F.3d 685 (9th Cir. 1997). *Id.* at ¶ 15. Moreover, the U.S. Trustee and counsel agreed in the Stipulation that according to *Gordon v. Hines (In re Hines)*, 147 F.3d 1185 (9th Cir. 1998), discussed in *In re Grimmert*, that counsel was only entitled to collect from the debtors the reasonable value of counsel's postpetition services to the debtors. In addition, the Stipulation provided that counsel would, in the future, advise his clients of any plan to sell or transfer a debtor's account receivable and that counsel would inform the debtor of the name of the company to which the account would be factored as well as what information of the debtor was shared with the factoring company. *Id.* at ¶ 16. Finally, the Stipulation provided that counsel will not represent or imply to third parties that the U.S. Trustee agrees with counsel's ability to factor debtor account receivable or that it is a practice endorsed or approved by the U.S. Bankruptcy Court for the District of Idaho. *Id.* at ¶ 20.

B. *Bankruptcy Court's Approach and the Idaho State Bar's Decision*

On September 19, 2017, the Bankruptcy Court held a hearing on the Stipulation. Dkt. No. 60. At the hearing, the Court ruled that the order to be submitted by the U.S. Trustee and counsel shall prohibit counsel from engaging in any further factoring pending further order of the Court. *Id.* The Court ruled further that the U.S. Trustee is to investigate any other factoring completed by counsel and to take action the U.S. Trustee sees as appropriate. *Id.* Finally, the Court ordered that counsel solicit a formal ethics opinion from the Idaho State Bar concerning

the propriety of debtor's counsel factoring accounts receivable. *Id.* The Court thereafter entered an order to this effect. See Dkt. No. 62.

Another hearing was held by the Court on the status of the above order, on January 16, 2018. At the hearing, counsel reported that all the provisions of the Court's order have been complied with except for soliciting the ethics opinion from the Idaho State Bar. See Dkt. No. 75. Counsel reported that he hopes the inquiry will be submitted to the Bar by January 22, 2018. *Id.* On February 8, 2018, counsel reported that he had submitted, with the input of the U.S. Trustee, a formal ethics opinion request to the Idaho State Bar counsel. See Dkt. No. 78.

On April 12, 2018, counsel then filed a status report indicating, with letter attached from the Idaho State Bar counsel, that a formal ethics opinion would not be rendered by the State Bar. Dkt. Nos. 84, 84-1. In summary, Idaho State Bar counsel concluded that the Bar would not be able to provide an ethics opinion on this matter because: (1) substantive bankruptcy law is at issue, as evidenced by the Court's decisions in *Grimmett and Hirsch*; (2) legislation may be needed to address the issue; and (3) informed consent of a debtor is difficult to measure on this issue and more facts would be needed as to all communications between lawyer and client to determine informed consent. Counsel further referenced his presentation at the annual Bankruptcy Seminar on February 16, 2018, and stated "I think the difficulty of rendering a conclusive formal ethics opinion on these topics was further demonstrated during the audience questions and discussions about these issues at the recent Annual Bankruptcy Seminar." Dkt. No. 84-1 at 2.

III. Conclusion

While unbundling of attorney services may be doable post *In re Grimmert* it appears to be a barely open door that may only be squeezed through by a careful practitioner. In contrast to *In re Grimmert*, the door on factoring of attorney fees seems to be slammed shut as held in *In re Hirsch*. With no ethics opinion from the Idaho State Bar stating otherwise, factoring of attorney fees is foreclosed for now.

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HON. JIM D. PAPPAS, U.S. BANKRUPTCY JUDGE, DISTRICT OF IDAHO

Ron Kerl

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On March 22, at the end of his second term, U.S. Bankruptcy Judge Jim D. Pappas will step down as one of the District of Idaho's two bankruptcy judges. Fortunately for the District of Idaho and the Ninth Circuit, Judge Pappas has accepted a recall appointment from the Ninth Circuit Court of Appeals and will continue to serve as a bankruptcy judge for the foreseeable future. Judge Pappas' semi-retirement comes at the end of a distinguished career, both as a skilled lawyer and as a widely respected jurist.

Judge Pappas is a native of Pocatello. His father and family emigrated from Greece in the early 20th century. His grandfather supported the family as a shoemaker. His father served the country during World War II as a member of the U.S. Army quartermaster corps. After his service to his country, Mr. Pappas returned to Pocatello and married Judge Pappas' mother, who brought into the family five children. Judge Pappas' father, along with two others, later started a Pocatello-based company that eventually became a major regional road construction company. As the youngest of the six Pappas children, Pappas grew up in the famed Iron Triangle of Pocatello. There, many immigrant and ethnic families formed a diverse community committed to bettering their lots in life.

Teaming up with a friend who went on to become an associate attorney general in Connecticut, Judge Pappas first practiced the art of persuasion by joining the Pocatello High School debate team. His fledgling passion for logical reasoning and persuasive argument served him well during state debate competitions, including one contest with an Idaho Falls High School team featuring now-U.S. Sen. Mike Crapo.

After high school, Judge Pappas, a declared government major, continued debating at Idaho State University (ISU). Scholarships and part-time and summer work helped him pay the cost of his higher education. While at ISU Judge Pappas met and married Julie Roske of Twin Falls, his wife of 45 years. With Julie's encouragement and financial assistance from her fulltime job, Judge Pappas redoubled his commitment to further his education. It was at ISU that Judge Pappas met and became lifelong friends with Hon. Lynn B. Winmill, now the chief district judge for the



District of Idaho. Upon graduation in 1974, his love of advocacy and work ethic led Judge Pappas to enroll at the University of Idaho College of Law.

At the law school Judge Pappas flourished as a student, was active in the school's moot court program, and was elected editor-in-chief of the Idaho Law Review. Judge Pappas' son, Matt Pappas, now a successful Boise attorney, was born early on the morning of a law school final exam, and—evidencing the multitasking skills required of a successful law student—Judge Pappas scored an A on that day's criminal law test.

Judge Pappas held a strong desire to return to his home town of Pocatello following his law school graduation. Because of this, he declined an offer from a Ninth Circuit judge to serve as a law clerk—a serious and inexplicable mistake in the eyes of future law school dean, Sheldon Vincenti, who at the time admonished Judge Pappas that his choice was likely the worst professional decision he could ever make.

Instead, Judge Pappas signed on as an associate with the Pocatello firm led by Jim Green, Archie Service, and Clark Gasser. The firm had a variety of individual and corporate clients, which Judge Pappas saw as an exceptional opportunity for him to develop and hone his legal skills and grow his own law practice. In addition to the firm's partners, Judge Pappas was excited by the opportunity to work with Ron Kerl, whom he had admired in law school as another Idaho Law Review editor-in-chief. He was also anxious to work at the firm with Alberta Phillips, one of Idaho's very first woman lawyers and the first woman to serve on the University of Idaho's College of Law faculty.

In what was primarily a "people practice," the Pocatello firm's diverse clientele offered Judge Pappas an immediate opportunity to counsel clients face to face and to make frequent appearances to represent their interests in the courtroom. Shortly after joining the firm, Clark Gasser was retained by famed local bankruptcy trustee L. D. Fitzgerald to represent him in bankruptcy court. Gasser, in turn, asked Judge Pappas to help with the representation. While Gasser was not enamored with the highly technical aspects of bankruptcy practice, Judge Pappas was enthusiastic about the opportunity it presented. He embraced bankruptcy law as a specialty, and began his noteworthy career counseling several bankruptcy trustees and many other clients needing bankruptcy representation.

Then, in 1978, the new Bankruptcy Code was enacted by Congress, which completely overhauled existing bankruptcy laws and procedural rules. One day, Idaho's venerable bankruptcy judge, Merlin Young, invited young Pappas to join him for dinner at a Pocatello restaurant. At

the meeting, as he did with other Idaho lawyers, Judge Young encouraged Judge Pappas to become familiar with the new bankruptcy law and urged him to attend a nationally recognized bankruptcy seminar in order to learn more about the new Bankruptcy Code. Recognizing Judge Pappas' enthusiasm for, and his fledgling, but growing knowledge of the new Bankruptcy Code, the law firm concurred with Judge Young's recommendation, and paid for Judge Pappas to attend a seminar in San Francisco where he was schooled for a week by the lawyer-drafters of the new code.

The Bankruptcy Code presented Judge Pappas, still relatively inexperienced, with the opportunity to engage in a "leading edge" bankruptcy law practice where he could help shape the interpretation and application of the "new law" by bankruptcy and appellate judges. Having taken a big gulp of the "bankruptcy Kool-Aid," Judge Pappas proved to be an exceptional student, counselor, and practitioner. In particular, he developed innovative and effective strategies and argued novel legal theories designed to enforce the bankruptcy trustee's special powers. Over the years, he contested matters with and against some of the best debtor and creditor lawyers practicing in the District of Idaho and throughout the Intermountain West. Judge Pappas' bankruptcy practice soon included representation of major regional lenders in Idaho, Utah, and Montana, where he honed his skills and gained a reputation as a formidable bankruptcy law advocate.

While in practice, along with a group of other mostly young bankruptcy lawyers, Judge Pappas organized a voluntary group to promote the practical education of bankruptcy lawyers in Idaho. At the suggestion of Pocatello friend and lawyer Don Burnett, now dean emeritus of the University of Idaho College of Law, who at the time was president of the Idaho State Bar, the group formed what became the Idaho State Bar's first practice section: the Commercial and Bankruptcy Law Section. Judge Pappas served on the original board, and then as chair of the section. In 1989, Congress granted the District of Idaho a second bankruptcy judgeship. The first appointee for this position was Hon. Edward Lodge. When Judge Lodge was elevated to the district court, Judge Pappas was encouraged by his friends and colleagues to apply for the vacant bankruptcy judgeship. Competing with many other excellent bankruptcy lawyers from Idaho and across the country, after a merit selection process, on March 23, 1990, the 38-year old Judge Pappas was sworn in to serve a 14-year term as the fourth bankruptcy judge for the District of Idaho. He was reappointed to a second term in 2004. During his tenure, Judge Pappas served as the district's chief bankruptcy judge for 11 years. Over

his two terms, Judge Pappas presided over more than 100,000 bankruptcy cases in Idaho, always displaying:

- A near-encyclopedic knowledge of the Bankruptcy Code and the case law interpreting it;
- Grace and compassion for the debtors who have come before him for relief from their financial woes;
- High expectations of, but respect for, the bankruptcy trustees and lawyers who have appeared before him;
- An always collegial attitude toward the judges, court clerks, and courthouse staff with whom he has served.

In 2005, Judge Pappas was afforded the high honor of an appointment by the Ninth Circuit Court of Appeals to serve as one of six judges on its Bankruptcy Appellate Panel (BAP). The BAP decides appeals from the bankruptcy courts in Alaska, Hawaii, Guam, Northern Mariana Islands, Washington, Oregon, California, Arizona, Nevada, Idaho, and Montana. In addition to performing his regular duties as a full-time bankruptcy judge in the District of Idaho, and while serving in other districts as a visiting judge on various assignments, Judge Pappas participated in the disposition of over 3,000 appeals while with the BAP, and authored hundreds of appellate decisions and opinions. Judge Pappas was chief judge of the BAP for three of his 10 years on the BAP.

Judge Pappas' accomplishments while on the bankruptcy bench have been remarkable. In addition to his judicial duties, as a scholar and an educator of judges, lawyers, students, and the public, Judge Pappas has:

- Authored and edited numerous scholarly articles, including those published in the American Bankruptcy Law Journal where Judge Pappas served as an associate editor;
- Served two terms on its Board of Governors and contributed as a frequent program speaker for the National Conference of Bankruptcy Judges;
- Was appointed by the chief justice of the United States and served two terms on the U.S. Judicial Conference Bankruptcy Judge Education Committee, where Judge Pappas helped design and deliver professional instruction to America's new and experienced bankruptcy judges;
- Served as adjunct professor, teaching bankruptcy law, at the University of Idaho College of Law at its Boise campus;
- L lectured regularly at continuing education panels for lawyers and judges, and at public forums, throughout Idaho and the country.

Judge Pappas, throughout his career, has been a

fervent proponent for “taking justice to the people” by maintaining an active presence of the federal courts in all regions of Idaho. As a result, Pappas has traveled almost 500,000 miles driving between Idaho’s federal courthouses. Perhaps as one of his proudest achievements, Judge Pappas, with the other judges, advocated for and helped design and construct the U.S. Courthouse and Federal Building located in Pocatello. Opened in 1999, the courthouse included Idaho’s first fully electronic courtroom. When he assumes a recall status, Judge Pappas will maintain chambers at the Pocatello courthouse.

Notwithstanding his personal and professional accomplishments, Judge Pappas is quick to attribute his success to the support of his family, especially his wife Julie and the hard work of his support staff and law clerks. Judge Pappas also gives credit for the many opportunities he had to make important decisions on challenging legal issues to Idaho’s practicing bankruptcy bar, which he considers to be one of the most ethical, collegial bars in America.

Upon recall, Judge Pappas and Julie hope to travel, golf, and spend time with their children and grandchildren, including son Matt and his wife Nikki, a legal assistant, in Boise, and daughter Staci and her husband Jeff Hoseley, both accomplished Meridian high school teachers. In addition to judging part time, Judge Pappas plans to continue to write, teach, and lecture.

Ron Kerl is admitted to practice law in all state and federal courts of Idaho and the Ninth Circuit Court of Appeals in San Francisco. He has served as president of the local (Sixth District Bar Association 1982), the statewide Idaho State Bar (1994), and the Portneuf Inns of Court (1996). He has chaired numerous Idaho State Bar committees (Bar Exam Grading, Professional Conduct, Long Range Planning) and has served on the Idaho Law Foundation’s Fund Development Committee.

FAMOUS PEOPLE WHO SURVIVED BANKRUPTCY

Abraham Lincoln

Ulysses S. Grant

Thomas Jefferson

William McKinley

Henry Ford

Walt Disney

Milton Hershey

Burt Reynolds

H.J. Heinz

P.T. Barnum

Web Source: <http://mentalfloss.com/article/20169/7-wildly-successful-people-who-survived-bankruptcy>

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