

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:	)	
	)	B/K Case No. 26-02880-EG
SEA PALMS COUNCIL OF	)	
CO-OWNERS	)	
	)	Chapter 11
Debtor.	)	

APPLICATION TO EMPLOY ATTORNEY

The Application of Sea Palms Council of Co-Owners respectfully represents:

1. On June 26, 2026, Sea Palms Council of Co-Owners, the Debtor-in-Possession (the "Debtor"), filed a petition under Chapter 11, subchapter V, of the Bankruptcy Code.

2. Since the bankruptcy filing, the Debtor has continued in possession of its property.

3. The Debtor requests that the court authorize it to employ the Campbell Law Firm, P.A., all members of which have been admitted to practice in this Court, of Post Office Box 684, Mt. Pleasant, SC 29465, telephone number is (843) 884-6874, as its attorney.

4. The Debtor desires to employ the Campbell Law Firm, P.A. under a general retainer, with a proposed compensation of \$500.00 per hour for Kevin Campbell; \$450.00 per hour for Michael H. Conrady; \$350.00 per hour for Suzanne Campbell Chisholm; and \$150.00 per hour for staff. The Campbell Law Firm understands the compensation is subject to approval by the Court. The Trustee and the Campbell Law Firm, P.A. understand that the Campbell Law Firm P.A.'s compensation will be set by the court, pursuant to 11 U.S.C. §330(a) and that the amount of compensation awarded by the Court may differ from that agreed upon between them.

5. The Debtor desires to employ to Campbell Law Firm, P.A. as the Firm is familiar with the unique legal issues that may arise in a bankruptcy case and with the Bankruptcy Code and the attorneys are competent to handle the matters assigned to them.

6. The undersigned counsel and all members of the Campbell Law Firm, P.A. have read and do understand the "MEMORANDUM" issued by the Director of the United States Trustee Program dated December 4, 2019. The Campbell Law Firm, P.A., consists of three attorneys licensed to practice law in the state of South Carolina, and in no other state. The Campbell Law Firm employs no other individuals, and has no other affiliates. The law firm employs the following individuals: Kevin Campbell, who is a W-2 employee; Michael Conrady, who is a W-2 employee; and Suzanne Campbell Chisholm, who is a W-2

employee. None of the three employees are employed by any other individual or entity, and none of the three have any interest in any other business.

7. To the best of the Debtor's knowledge and information, the Campbell Law Firm, P.A. is a disinterested person as that term is defined by 11 U.S.C. §101(14) and that the Campbell Law Firm, P.A. does not hold or represent an interest adverse to the estate.

8. Neither the Campbell Law Firm, P.A., nor any of its employed individuals or owners own any other affiliates, nor do any of those individuals own any investments with or that would affect in any manner whatsoever, the representation of clients of the Campbell Law Firm, P.A. The Campbell Law Firm, P.A. has no contractual arrangement with any client to keep information confidential, nor does the Law Firm have any policy or procedure for such. If any such circumstances did arise, the Law Firm would seek a Court Order pertaining to such issue. The Campbell Law Firm, P.A. does not participate in any mutual funds or other such investments. The Campbell Law Firm, P.A. policy is to have each state member review each debtor's list of creditors and parties in interest, including other clients of the firm both past and present to ensure there are no potential or actual conflicts of interest.

9. The Campbell Law Firm, P.A. has a process for checking conflicts as follows: It maintains a data base of all clients it has represented over the past 30 years, which is available to all three individual attorneys in the Firm. Additionally, each attorney in the Firm questions a potential client about his/her or its means of making income, their associations, affiliates, etc., to ensure that no conflict, potential or actual, is present. Further, the Campbell Law Firm, P.A. checks any conflicts potential clients may have by conducting due diligence that includes public records checks, lawsuit reviews, associates, affiliates, and other such background checks. A more stringent check is employed by the Campbell Law Firm, P.A. for business clients and/or consumer clients engaged in business. An example would be Google and/or other internet based background checks.

10. With the following exceptions, to the best of the Debtor's knowledge, neither any attorney employed by, nor the Campbell Law Firm, P.A. has any connections with the Debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee or any person employed in the office of the United States Trustee, except that the Kevin Campbell serves on the panel of Chapter 7 Trustees appointed, maintained and supervised by the United States Trustee and that Kevin Campbell is routinely appointed to cases by the United States Trustee.

11. Kevin Campbell has for more than 40 years filed cases in the Bankruptcy Court in the State of South Carolina under Chapters 7, 11 and 13. Therefore, he has during that period of time dealt with attorneys for the Office of the United States Trustee, and its employees, with members of the South Carolina Bankruptcy Bar, and the members of the judiciary and staff of the South Carolina Bankruptcy Courts. No other connections or relationships with any of those parties exist.

12. The Debtor and Kevin Campbell and Campbell Law Firm, PA understand that the compensation will be set by the Court pursuant to 11 U.S.C. §330(a) and that the

amount of compensation set by the Court may be different than that agreed to between them.

WHEREFORE, the Debtor prays that this court issue its order authorizing it to employ the services of Campbell Law Firm, PA as attorney for the Debtor; and for such other and further relief as to this court seems just and proper.

SEA PALMS COUNCIL
OF CO-OWNERS

/s/ Kent Lovett
KENT LOVETT
President

MT. PLEASANT, SOUTH CAROLINA
Dated: June 26, 2026

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

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AFFIDAVIT

I, Kevin Campbell, hereby make solemn oath:

1. The Campbell Law Firm, P.A. is comprised of three attorneys who are duly admitted to practice in the State of South Carolina and in this court.

2. The Campbell Law Firm, P.A. maintains only one office at 890 Johnnie Dodds Blvd., Mt. Pleasant, SC 29465.

3. The Debtor has requested that Campbell Law Firm, P.A. be allowed to represent the Debtor in this case. The services to be performed by the attorneys are outlined in the Application being filed simultaneously.

4. To the best of my knowledge, the Campbell Law Firm, P.A. and all members of the firm are disinterested persons in this case as that term is defined in 11 U.S.C. § 101(14). The Campbell Law Firm, P.A., nor any of the individual lawyers, hold or represent an interest adverse to the estate. Prior to the filing of this bankruptcy case, the Campbell Law Firm, P.A. was retained by the Debtor to file for bankruptcy relief. The Debtor paid the Campbell Law Firm, P.A. a retainer fee of \$12,500.00. Prior to the filing for bankruptcy relief, the Campbell Law Firm, P.A. provided services totaling \$ 4,545.00. As a result, there remains a credit of \$ 7,955.00 retained in trust by the Campbell Law Firm.

5. Neither the Campbell Law Firm, P.A., nor any of its employed individuals or owners own any other affiliates, nor do any of those individuals own any investments with or that would affect in any manner whatsoever, the representation of clients of the Campbell Law Firm, P.A. The Campbell Law Firm, P.A. has no contractual arrangement with any client to keep information confidential, nor does the Law Firm have any policy or procedure for such. If any such circumstances did arise, the Law Firm would seek a Court Order pertaining to such issue. The Campbell Law Firm, P.A. does not participate in any mutual funds or other such investments. The Campbell Law Firm, P.A. policy is to have each state member review each debtor's list of creditors and parties in interest, including other clients of the firm both past and present to ensure there are no potential or actual conflicts of interest.

6. The Campbell Law Firm, P.A. has a process for checking conflicts as follows: It maintains a data base of all clients it has represented over the past 30 years, which is available to all three individual attorneys in the Firm. Additionally, each attorney in the Firm questions a potential client about his/her or its means of making income, their associations, affiliates, etc., to ensure that no conflict, potential or actual, is present. Further, the Campbell Law Firm, P.A. checks any conflicts potential clients may have by conducting due diligence that includes public records

checks, lawsuit reviews, associates, affiliates, and other such background checks. A more stringent check is employed by the Campbell Law Firm, P.A. for business clients and/or consumer clients engaged in business. An example would be Google and/or other internet based background checks.

7. With the following exceptions, to the best of the undersigned's knowledge, neither any attorney employed by, nor the Campbell Law Firm, P.A. has any connections with the Debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee or any person employed in the office of the United States Trustee, except that the Kevin Campbell serves on the panel of Chapter 7 Trustees appointed, maintained and supervised by the United States Trustee and Kevin Campbell is routinely appointed to cases by the United States Trustee. The Campbell Law Firm, P.A. has represented and is currently representing the Kevin Campbell in his capacity as Trustee in Chapter 7. Kevin Campbell, the Trustee, is a partner in the Campbell Law Firm, P.A.

8. The undersigned counsel has for more than 40 years filed cases in the Bankruptcy Court in the State of South Carolina under Chapters 7, 11 and 13. Therefore, the undersigned counsel has during that period of time dealt with attorneys for the Office of the United States Trustee, and its employees, with members of the South Carolina Bankruptcy Bar, and the members of the judiciary and staff of the South Carolina Bankruptcy Courts. No other connections or relationships with any of those parties exist.

9. Campbell Law Firm, P.A., and individual attorneys have agreed that the Campbell Law Firm, P.A. will be employed on a general retainer basis, that the Campbell Law Firm, P.A. attorney's will bill at their customary rate of \$500.00 per hour for Kevin Campbell, and \$450.00 per hour for Michael Conrady; and \$350.00 per hour for Suzanne Campbell Chisholm. Their support staff shall submit bills for legal work performed at a rate of \$150.00 per hour. The Trustee and the Campbell Law Firm, P.A. understand that the Campbell Law Firm's compensation shall be reviewed and set by the Court, pursuant to 11 U.S.C. § 330(a) and they understand that the amount of compensation they receive may differ from the bills that are submitted.

/s/ Kevin Campbell
KEVIN CAMPBELL
Post Office Box 684
Mt. Pleasant, SC 29465
(843) 884-6874/ 884-0997 (fax)
District Court ID No.: 30
kcampbell@campbell-law-firm.com

MT. PLEASANT, SOUTH CAROLINA
Dated: June 26, 2026
/s/ Michael H. Conrady
NOTARY PUBLIC FOR THE STATE
OF SOUTH CAROLINA
My Commission Expires: 9-1-31

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CERTIFICATE OF MAILING

I, Michael H. Conrady, attorney with the Campbell Law Firm, P.A. hereby certify that on this day the United States Trustee's Office was served electronically with a true and correct copy of the following:

APPLICATION FOR APPOINTMENT OF ATTORNEY AND PROPOSED ORDER

/s/ Michael Conrady
MICHAEL H. CONRADY, ESQ.
Campbell Law Firm, PA
Post Office Box 684
Mt. Pleasant, SC 29465
(843) 884-6874/ (843) 884-0997 fax

Mt. Pleasant, South Carolina
Dated: June 26, 2026

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ORDER AUTHORIZING DEBTOR TO EMPLOY ATTORNEY

This matter is before the Court upon the Application of Sea Palms Council of Co-Owners, as Debtor-in-Possession (hereinafter the "Debtor"), for authorization to employ the firm the Campbell Law Firm, P.A., as its attorney in the above-referenced case.

After consideration of the Debtor's Application, and it appearing that the Campbell Law Firm, P.A. are attorneys duly admitted to practice in this Court, that they hold or represent no interest adverse to this estate, that their employment is necessary and is in the best interest of the estate, it is

ORDERED, that the Debtor be, and hereby is, authorized to employ the Campbell Law Firm, P.A. as attorneys for the Debtor pursuant to the terms of the annexed Application. The compensation of the attorney shall be set by the Court pursuant to 11 U.S.C. §330(a) and may be different than the agreement between the Debtor and the attorney.