

From: Scott Myers
To: RulesCommittee Secretary
Cc: Bridget Healy; Shelly Cox
Subject: Suggestion concerning Bankruptcy Form 2030
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In its opinion *In re Aquilino*, the Third Circuit Court of Appeals suggests that Bankruptcy Form 2030, *Disclosure of Compensation of Attorney for Debtor*, be reviewed to determine whether changes are warranted to address possible confusion at issue in the case. *In re Aquilino*, No. 24-1781, 2025 WL 1187080 (3d Cir. Apr. 24, 2025). An excerpt of **Footnote 16** from the opinion is copied below.

In view of the confusion engendered by the form in this case, the Director of the Administrative Office of the United States Courts may wish to consider whether revisions are warranted. The form used by Spector Gadon here is materially identical to Bankruptcy Form 2030, save for an additional item appearing at section 2, thereby setting off the forms' numeration by one. Aside from this discrepancy, the two forms are identical in their respective sections most relevant to this case. Section 5 of Bankruptcy Form 2030 (section 6 of Spector Gadon's form) states, "In return for the above-disclosed fee, I have agreed to render legal service for all aspects of the bankruptcy case," and then lists subcategories of common bankruptcy services at (a)–(d), followed by "[o]ther provisions as needed" at (e). That could lead debtors' counsel completing the form to believe that a notation at subsection (e) or a marking on some, but not all, of the other subsections would effectively communicate that the remainder were excluded from the representation and that no additional notations were needed in section 6, as Spector Gadon seemingly believed here.

SCOTT MYERS
Counsel | Rules Committee Staff
Office of the General Counsel

Administrative Office of the U.S. Courts