

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

In re:
GREENFIELD SILVER, INC.
f/k/a Lunt Silversmiths, Inc.

Debtor

Chapter 11
Case No. 09-32228-HJB

APPLICATION TO EMPLOY AUCTIONEER

(REQUEST TO LIMIT NOTICE)

Now comes the debtor-in-possession, Greenfield Silver, Inc. f/k/a Lunt Silversmiths, Inc. (the "Debtor"), by and through counsel, and hereby respectfully prays that it be granted authority to employ the firm of Aaron Posnik & Co., Inc. ("Posnik") as auctioneer. In support thereof, the Debtor respectfully states as follows:

1. On December 18, 2009 the Debtor filed a petition for relief under Chapter 11 of the Bankruptcy Code with this Court.
2. The matters set forth herein constitute core proceedings, pursuant to 28 U.S.C. §157(b)(2)(A).
3. Prior to the filing of the petition the Debtor operated a silver flatware and giftware manufacturing and retail business located at 298 Federal Street, Greenfield, Massachusetts.
4. The Debtor intends to liquidate its assets through this Chapter 11.
5. The Debtor possesses personal property that it wishes to sell comprised of the following: Lunt Sterling 3 piece tea set, Lunt sterling tea pot, Tiffany sterling tea pot, 4 piece

silver plate tea set, Lunt 2 piece sterling surag and creamer set and 3 piece sterling Mexican set (the "Silver") which it intends to sell by public auction.

6. The Debtor has also filed on January 4, 2011 a Motion for Order Approving Auction Sale of Property of the Estate Free and Clear of Liens and Encumbrances Pursuant to 11 U.S.C. §363(b) which requests this Court's authority to sell the Silver by public auction (the "Motion for Second Public Sale").

7. As stated in the Motion for Second Public Sale, the Debtor wishes to employ Posnik as auctioneer to conduct the auction, as Posnik is a reputable and experienced auctioneer in this community. The auction will be conducted on Aaron Posnik & Co., Inc.'s premises at 83 State Street, Springfield, MA.

8. The Debtor's Silver will not be auctioned together with non-bankruptcy estate items.

9. On information and belief, Posnik is disinterested, and does not hold or represent any interest adverse to the estate.

10. The Debtor seeks to compensate Posnik in accordance with the provisions of Massachusetts Local Bankruptcy Rule 6004-1(b), as follows: ten (10%) percent of the first \$10,000 received or part thereof; seven (7%) percent on the next \$10,000; six (6%) percent on the next \$35,000.00; and five (5%) percent of the balance.

11. With respect to expenses, Posnik has provided the following estimate of expenses necessary to conduct the auction of the Silver by public auction:

- (a) The expense for advertising through two advertisements in the local Republican newspaper and mailing 300 flyers to local jewelers is estimated at \$1,000.00.
- (b) Posnik will not charge any labor or rental fee for space.

(c) The Silver will also be advertised on Posnik's website for no charge.

12. To the best of the Debtor's knowledge, Posnik has no connections with the Debtor, its 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.

13. The Auctioneer's Affidavit in support hereof and in accordance with Local Rule 2014-1 is attached as Exhibit A.

14. The Auctioneer's Statement of Full Bonding Coverage in accordance with Local Rule 6004-1(d)(6) is attached hereto as Exhibit B.

15. Request is hereby made to limit notice regarding this Application upon the individuals and entities served with this Application, which are as follows: the U.S. Trustee, the Debtor, the top twenty unsecured creditors, the creditors committee, Gary Weiner, Esquire as counsel to the creditors committee, and all attorneys who have filed appearances in this case.

16. The Debtor submits that due to the nature of this Application, no further service is necessary.

WHEREFORE, the Debtor respectfully prays:

1. That this Court authorize the Debtor to employ Aaron Posnik & Co., Inc. as auctioneer, according to the terms herein with allowance of fees and expenses to be subject to further application with this Court;
2. That this Court authorize limited notice as requested herein.
3. For such further relief as this Court deems just and proper.

Respectfully submitted this 13th day of January, 2011.

SHATZ, SCHWARTZ AND FENTIN, P.C.

By: /s/ Edward V. Sabella
Edward V. Sabella, Esquire
esabella@ssfpc.com
BBO #436820
L. Alexandra Hogan, Esquire
lahogan@ssfpc.com
BBO #672561
1441 Main Street – Suite 1100
Springfield, MA 01103
Telephone - (413) 737-1131
Facsimile - (413) 736-0375

09\0185\Auctioneer\Posnik\Sale Silver\Posnik second application employ auctioneer.4801

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

In re:
GREENFIELD SILVER, INC.
f/k/a Lunt Silversmiths, Inc.

Debtor

Chapter 11
Case No. 09-32228-HJB

AFFIDAVIT OF AUCTIONEER

Now comes Paul W. Scheer and respectfully states the following under oath:

1. I am the President of Aaron Posnik & Co., Inc. ("Posnik").
2. Posnik is duly authorized and licensed to conduct auction sales in the Commonwealth of Massachusetts.
3. Posnik is qualified to conduct a public auction for the debtor-in-possession Greenfield Silver, Inc. f/k/a Lunt Silversmiths, Inc. (the "Debtor"), as Posnik is a reputable company which has auctioned a wide range of assets including silver through various methods including public auctions.
4. Neither I nor any member of my firm holds or represents any interest adverse to the Debtor.
5. Neither I, nor my firm, have any connections with the Debtor, its creditors, or other party in interest, or their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee.
6. I and each member of my firm is a "disinterested person" as that term is defined in 11 U.S.C. §101(14).

7. I have not agreed to share with any person, except members of my firm, the compensation to be paid for services rendered in this case.

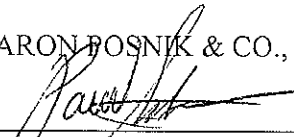
8. I have not received a retainer in this case.

9. I shall amend this statement immediately upon my learning that (A) any of the within representations are incorrect or (B) there is any change of circumstances relating thereto.

10. I have reviewed the provisions of M.L.B.R. 2016-1.

11. I declare under the penalty of perjury that the foregoing is true and correct.

AARON POSNIK & CO., INC.



Paul W. Scheer
President

Dated: December 22nd, 2010

COMMONWEALTH OF MASSACHUSETTS

Hampden, ss.

December 22, 2010

On this December 22, 2010 before me, the undersigned notary public, personally appeared, Paul W. Scheer proved to me through satisfactory evidence of identification, namely the person was [known to me, identified by affirmation of a credible witness, or identified in personally know to me, to be the person whose name is signed on the preceding or attached document and acknowledged to me that such person is the duly authorized President of Aaron Posnik & Co., Inc. and that such person signed such document voluntarily as such person's free act and deed for its stated purpose on behalf of such Aaron Posnik & Co., Inc.



Maria C. Goncalves, Notary Public
My Commission Expires:

April 7, 2011

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

In re:
GREENFIELD SILVER, INC.
f/k/a Lunt Silversmiths, Inc.

Debtor

Chapter 11
Case No. 09-32228-HJB

**AUCTIONEER'S STATEMENT OF FULL BONDING
COVERAGE OF GOODS IN AUCTIONEER'S CUSTODY**

I, the undersigned, hereby represent:

1. That this firm has previously filed with this Court a blanket bond in the amount of \$100,000.00, conditioned upon the faithful performance of the firm's duties as auctioneer of goods owned by the estate of the Debtor whose bankruptcy case is pending in this district, which bond is dated January 24, 2010 and is terminable upon thirty (30) days' written notice by the surety.
2. I have filed a copy of that bond with the United States Trustee.
3. I am licensed as an auctioneer by the Commonwealth of Massachusetts (License No. 202), and in the states of FL, GA, IL, LA, ME, MS, NH, NC, OH, PA, RI, TX, VT, and VA. I am in good standing in all jurisdictions in which I am licensed; I am not subject to any disciplinary proceedings, nor have I been subject to any disciplinary proceedings in the last 5 years.

4. The assets of the estate which will come in my custody do not exceed in value the penalty amount of the aforesaid bond in any separately obtained surety bond filed with this Court and the United States Trustee relating to the estate goods in particular cases.

5. In addition, I hereby promise:

- (a) That if before the completion of the auction sale in this case, by the turnover of proceeds to the Debtor, I shall be authorized by this Court to serve in such additional cases as might result in the total value of bankruptcy goods in my custody exceeding the penalty amount of all my applicable bond coverage, I will obtain either: an increase in the penalty amount of my blanket bond; or a separate surety bond so that all bankruptcy goods in my custody are at all times fully-covered by surety bonds.

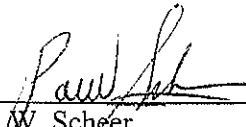
6. Upon completion of the auction sale of the Debtor's assets in this case, I will turn over to the Debtor:

- (a) an accounting for all goods I receive;
- (b) the gross proceeds therefrom; and
- (c) my itemized bill and proof of expenses incurred in connection with the sale.

7. In accordance with 28 U.S.C. §1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: December 22, 2010

AARON POSNIK & CO., INC.




Paul W. Scheer
President

COMMONWEALTH OF MASSACHUSETTS

Hampden, ss.

December 22, 2010

On this December 22, 2010 before me, the undersigned notary public, personally appeared, Paul W. Scheer proved to me through satisfactory evidence of identification, namely the person was [known to me, identified by affirmation of a credible witness, or identified in personally known to me, to be the person whose name is signed on the preceding or attached document and acknowledged to me that such person is the duly authorized President of Aaron Posnik & Co., Inc. and that such person signed such document voluntarily as such person's free act and deed for its stated purpose on behalf of such Aaron Posnik & Co., Inc.



Maria C. Goncalves, Notary Public

My Commission Expires:

April 7, 2011

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

In re:

GREENFIELD SILVER, INC. f/k/a

Lunt Silversmiths, Inc.

Debtor

Chapter 11

Case No. 09-32228-HJB

DECLARATION ELECTRONIC FILING

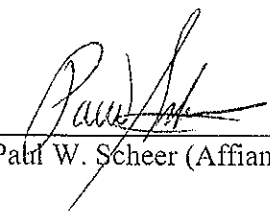
PART I - DECLARATION

I Paul W. Scheer of Aaron Posnik & Co., Inc., *hereby declare(s) under penalty of perjury* that all of the information contained in the **AFFIDAVIT AND BONDING STATEMENT** (singly or jointly the "Document"), filed electronically, is true and correct. I understand that this *DECLARATION* is to be filed with the Clerk of Court electronically concurrently with the electronic filing of the Document. I understand that failure to file this *DECLARATION* may cause the Document to be struck and any request contained or relying thereon to be denied, without further notice.

I further understand that pursuant to the Massachusetts Electronic Filing Local Rule (MEFLR)-7(a) all paper documents containing original signatures executed under the penalties of perjury and filed electronically with the Court are the property of the bankruptcy estate and shall be maintained by the authorized CM/ECF Registered User for a period of five (5) years after the closing of this case.

Dated: December 22, 2010

Signed: _____


Paul W. Scheer (Affiant)

09\0185\Auctionecr\Dec of Elec.Scheer.12302