

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

IN RE:	X	
	X	
ADVANCED SOLIDS CONTROL, LLC	X	CASE NO. 16-52748-RBK
	X	
DEBTOR	X	CHAPTER 11

**MOTION OF ADVANCED SOLIDS CONTROL, LLC FOR AUTHORIZATION TO SELL REMAINING PERSONAL PROPERTY FREE AND CLEAR OF ALL LIENS, CLAIMS AND ENCUMBRANCES AT REDUCED MINIMUM PRICES**

**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD.**

**A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE HELD.**

TO THE HONORABLE RONALD B. KING, CHIEF JUDGE,  
UNITED STATES BANKRUPTCY COURT:

NOW COMES, Advanced Solids Control, LLC, Debtor-in-Possession in the above styled and numbered Chapter 11 bankruptcy case, and files this its Motion For Authorization to Sell Remaining Personal Property Free and Clear of All Liens, Claims and Encumbrances at Reduced Minimum Prices , and in support thereof would respectfully show the Court the following:

1. On December 2, 2016, Advanced Solids Control, LLC (hereinafter called "Debtor") filed its voluntary Petition for Relief under Chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Western District of Texas, San Antonio Division.

2. The assets proposed to be sold consists of the remaining personal property described as residential furniture from multiple real properties the Debtor owns/owned in New Mexico. The majority of the real properties have been sold, with one final property being put on the market at the end of the month, and the furniture must be liquidated. The Debtor has previously attempted to sell the furniture as a package with the real property with no success.

3. The Debtor previously filed a Motion to Sell the personal property pursuant to a Consignment Agreement with H. Lancaster Co. (whom is not related to the Debtor). Pursuant to the Consignment Agreement, the Debtor is to receive seventy percent (70%) of the gross sales proceeds.

4. On May 5, 2017, the Debtor filed a Motion to Sell furniture free and clear of all liens, claims and encumbrances at minimum prices. The Court approved the Motion, and on May 12, 2017, the Order Granting Authority to Sell Personal Property Free and Clear of All Liens, Claims and Encumbrances at Minimum Prices was entered authorizing the Debtor to sell furniture at minimum prices.

5. Pursuant to the Order authorizing sale of furniture, the Debtor has sold the furniture set forth on Exhibit "A" attached hereto in the total amount of \$14,867.25.

6. H. Lancaster Co. attempted to sell some of the furniture and was unable to sell a single piece of furniture.

7. The Debtor has the remaining furniture (including the furniture located in the final house in Carlsbad - 4004 North Pat Garrett), as set forth on Exhibit "B" attached hereto, left for sale.

8. The Debtor is not in a position to spend any more time and does not believe it will be cost effective to spend more time selling the remaining items of furniture.

9. The Debtor believes it is better to lower the minimum price in an effort to efficiently liquidate the remaining furniture. The new proposed minimum prices are set forth on Exhibit "B" attached hereto.

10. Most of the remaining furniture is more worn than other pieces, and has proven to be harder to sell than expected.

11. The Debtor's plan to liquidate the furniture as quickly as possible to generate what it believes to be the best value for the remaining pieces of furniture.

12. The Debtor believes that the proposed sale of the furniture will generate a reasonable value based upon the assets proposed to be sold and its marketability.

13. The proceeds from the sale will be used by the Debtor in its reorganization efforts/payment of creditors of the Estate.

14. The Debtor is requesting that the sale of the remaining furniture for the reduced minimum prices set forth on Exhibit "B" be free and clear of all liens, claims and encumbrances pursuant to §363 of the U.S. Bankruptcy Code.

15. A copy of the Order uploaded with this Motion is attached hereto.

WHEREFORE, PREMISES CONSIDERED, Debtor requests that the Court authorize it to sell free and clear of all liens, claims and encumbrances pursuant to §363 of the U.S. Bankruptcy Code the remaining personal property at the reduced minimum prices set forth on Exhibit "B" and pursuant to the terms set forth above, and for such other and further relief to which the Debtor may show itself entitled.

Date: June 14, 2017.

Respectfully submitted,



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WILLIAM R. DAVIS, JR.  
State Bar No. 05565500  
LANGLEY & BANACK, INC.  
745 E. Mulberry, Suite 900  
San Antonio, TX 78212  
(210) 736-6600

CERTIFICATE OF SERVICE

I hereby certify that on June 14, 2017, a true and correct copy of the above and foregoing instrument was mailed, first class, postage prepaid to the attached notice list.



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WILLIAM R. DAVIS, JR.

Advanced Solids Control, LLC  
c/o Mr. Lynn Frazier  
5655 Bear Lane, Suite 100  
Corpus Christi, TX 78405

U.S. Trustee  
P.O. Box 1539  
San Antonio, TX 78295-1539

Eddy County Treasurer  
101 W. Greene, Suite 117  
Carlsbad, NM 88220

First National Bank of Beeville  
1400 E. Houston St.  
Beeville, TX 78102

Midland Central Appraisal District  
P.O. Box 908002  
Midland, TX 79708

Midland County  
c/o Laura J. Monroe  
P.O. Box 817  
Lubbock, TX 79408

Nueces County  
P.O. Box 2810  
Corpus Christi, TX 78403

Darin Jerle Harding  
P.O. Box 743  
Grande Prairie Alberta T8V3R5

Sentrimax Centrifuges, Inc.  
108 Sentry Drive  
Mansfield, TX 76063

Gary Sweetman  
226 Augusta Drive  
Portland, TX 78374

Magnum Oil Tools Int'l, Ltd.  
5655 Bear Lane, Suite 100  
Corpus Christi, TX 78405

Crain, Caton & James  
17<sup>th</sup> Fl., 1401 McKinney St.  
Houston, TX 77010-4035

Stang Automation, Inc.  
100 Pointe Marcelle Beaumont  
Alberta T4X 0G2 Canada

Ber Mar Rewind, Ltd.  
9609 109 Street  
Grand Prairie AB T8V 4E3 Canada

Kirby-Smith Machinery, Inc.  
P.O. Box 270360  
Oklahoma City, OK 73137

Williams Scotsman, Inc.  
P.O. Box 91975  
Chicago, IL 60693-1975

Tucker Albin & Assoc., Inc.  
1702 N. Collins Blvd., Suite 100  
Richardson, TX 75080

Harvey Fuels, Inc.  
P.O. Box 8026  
Ruidoso, NM 88355

Forrest Tire, Inc.  
P.O. Box 1778  
Carlsbad, NM 88221-1778

A.G. Investments, Ltd.  
740 Walt Whitman Rd.  
Melville, NY 11747-9090

Pactec, Inc.  
P.O. Box 8069  
Clinton, LA 70722

ASK Environmental Equipment  
20504 Enfield Ave. N  
Forest Lake, MN 55025

Harvey Rodriguez  
215 E. Elm St.  
Loving, NM 88256

United Healthcare  
Dept. CH 1051  
Palatine, IL 60055-0151

DNOW, LP  
P.O. Box 40985  
Houston, TX 77240-0985

JB Electric, LLC  
P.O. Box 171  
Carlsbad, NM 88221

Big Dog - Rig Movers  
7500 W. Hwy. 80  
Midland, TX 79706

Robert L. Barrows  
Warren, Drugan & Barrows, PC  
800 Broadway  
San Antonio, TX 78215

Diane W. Sanders  
Linebarger Goggan Blair & Sampson  
PO Box 17428  
Austin, TX 78760

Ronald A. Simank  
Schauer & Simank, PC  
615 N. Upper Broadway, Suite 700  
Corpus Christi, TX 78401

Lee Gordon  
McCreary, Veselka, Bragg & Allen  
P.O. Box 1269  
Round Rock, TX 78680

Scott Duncan  
Magnum Oil Tools International  
5655 Bear Lane, Suite 100  
Corpus Christi, TX 78405

Furniture Sales - Month ended May 31, 2017

**EXHIBIT** A

Qty	Item	Name of Purchaser	Amount Paid
6	Barstools	Dave Resendez	750.00
1	Media Cabinet 65x22x32	Dave Resendez	544.00
2	End table 20x20x26	Dave Resendez	380.00
1	Entry Console Table 60x16x32	Dave Resendez	482.00
1	Queen Head & Foot boards	Dave Resendez	527.00
2	Nightstands	Dave Resendez	380.00
1	Dresser	Dave Resendez	542.00
1	Used Queen Mattresses & Box Spring Set	Dave Resendez	306.00
2	Barstools	Brandon Benton	200.00
1	Used Queen Mattresses & Box Spring Set	Janice Shanks	90.00
1	Leather Sofa	Lee Shiro	335.00
1	Washer & Dryer Set	Lee Shiro	250.00
1	Washer & Dryer Set	Brandon Kaderka	250.00
1	55" TV no remote	Erica Johnson	150.00
1	55" TV no remote	Christina Moore	150.00
1	55" TV no remote	Melissa Wallace	150.00
1	32" TV no remote	David Torres	50.00
1	32" TV no remote	Melissa Wallace	50.00
4	Barstools	Keller Harvey	400.00
2	End table 20x20x26	Keller Harvey	300.00
1	Console Table 60 x16x38	Keller Harvey	380.00
1	Used King Mattress & Box Spring	Richard Perez	190.00
1	Used Queen Mattresses & Box Spring Set	Christina Moore	90.00
1	Used Queen Mattresses only	Janice Shanks	45.00
1	Used Queen Mattresses only	Richard Perez	45.00
1	Used Queen Mattresses only	Christina Ramirez	45.00
1	Console Table 60 x16x38	Dave Resendez	380.00
1	Entry Mirror 30 x 40	Dave Resendez	115.00
1	Entry Mirror 30 x 40	Keller Harvey	115.00
1	Leather Sofa	Tracey Arrendo	335.00
2	Washer & Dryer Set	Tracey Arrendo	500.00
1	Washer & Dryer Set	Ryan Mernaugh	250.00
1	Dining Table	Ryan Mernaugh	196.00
6	Dining Chairs	Ryan Mernaugh	180.00
1	Queen Head & Foot boards	Christina Moore	211.00
1	Queen Head & Foot boards	Arlene Martinez	211.00
2	Leather Sofa	Leah Schexnayder	670.00
2	Used King Mattresses & Box Spring Set	Nico Gomez	260.00
1	Dresser	Arlene Martinez	217.00
1	Used King Mattresses & Box Spring Set	Hector Vargas	130.00
1	King Head & Foot boards	Hector Vargas	211.00
1	Queen Head & Foot boards	Rose Blair	211.00
1	Queen Head & Foot boards	Mark Tamez	211.00
1	King Head & Foot boards	Mark Tamez	211.00
1	Used King Mattresses & Box Spring Set	Nico Gomez	130.00
1	Dining Table	Fabian Leal	196.00



11

6	Dining Chairs	Fabian Leal	180.00
1	Media Cabinet 65x22x32	Fabian Leal	218.00
1	Entry Console Table 60x16x32	Fabian Leal	193.00
2	Nightstands	Fabian Leal	152.00
2	Dresser	Fabian Leal	434.00
2	Leather Sofa	Fabian Leal	672.00
4	Nightstands	Fabian Leal	304.00
1	King Head & Foot boards		211.00

14,385.00

Used Kitchen Household & Bedding Items - Garage Sale Pricing

Glassware

Dishes

Pots

Pans

Bedding

482.25

14,867.25 Total Sales

(14,656.25) Total Collected in Ma

211.00 Due

As of June 13, 2017

Remaining in Inventory-CC	Qty	Current Approved Pricing	Requested Pricing Jun 13	Total Potential Future Proceeds
Dining Tables	2	196	98	196
Dining Chairs	12	30	15	180
Media Cabinet 65x22x32	1	218	109	109
Cocktail Table 42x42x18	4	130	65	260
Console Table 60 x16x38	1	193	97	97
Entry Console Table 60x16x32	1	193	97	97
King Head & Foot boards	6	211	106	633
Queen Head & Foot boards	2	211	106	211
Nightstands	24	76	38	912
Used King Mattress & Box Spring	1	130	65	65
Leather Sofa	2	335	168	335

3,094

**EXHIBIT** B

of 11  
Total

As of June 13,, 2017

Requested  
Pricing Jun  
13  
Potential  
Future  
Proceeds**Remaining in Inventory-NM**

Qty

Dining Tables	1	98	98
Dining Chairs	6	15	90
Barstools	3	25	75
Media Cabinet 65x22x32	1	109	109
Cocktail Table 42x42x18	1	65	65
End Table 20x20x26	1	38	38
Console Table 60 x16x38	1	97	97
Entry Mirror 30 x 40	1	29	29
Entry Console Table 60x16x32	1	97	97
King Head & Foot boards	1	106	106
Queen Head & Foot boards	1	106	106
Nightstands	7	38	266
Dresser	1	109	109
Used King & Queen Mattress Set	2	25	50
Leather Sofa	2	168	335
Washer & Dryer set	1	125	150
55" TV	1	75	75

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1,893

Furniture Sales - Month ended May 31, 2017

**EXHIBIT**

A

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1	Media Cabinet 65x22x32	Dave Resendez	544.00
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2	Dresser	Fabian Leal	434.00
2	Leather Sofa	Fabian Leal	672.00
4	Nightstands	Fabian Leal	304.00
1	King Head & Foot boards		211.00
			<u>14,385.00</u>

Used Kitchen Household & Bedding Items - Garage Sale Pricing

- Glassware
- Dishes
- Pots
- Pans
- Bedding

482.25

14,867.25 Total Sales

(14,656.25) Total Collected in Ma

211.00 Due

As of June 13, 2017

Remaining in Inventory-CC	Qty	Current Approved Pricing	Requested Pricing Jun 13	Total Potential Future Proceeds
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**EXHIBIT** B

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Console Table 60 x16x38	1	193	97	97
Entry Console Table 60x16x32	1	193	97	97
King Head & Foot boards	6	211	106	633
Queen Head & Foot boards	2	211	106	211
Nightstands	24	76	38	912
Used King Mattress & Box Spring	1	130	65	65
Leather Sofa	2	335	168	335

3,094

As of June 13,, 2017		Requested Pricing Jun 13	Total Potential Future Proceeds
<b>Remaining in Inventory-NM</b>	<b>Qty</b>		
Dining Tables	1	98	98
Dining Chairs	6	15	90
Barstools	3	25	75
Media Cabinet 65x22x32	1	109	109
Cocktail Table 42x42x18	1	65	65
End Table 20x20x26	1	38	38
Console Table 60 x16x38	1	97	97
Entry Mirror 30 x 40	1	29	29
Entry Console Table 60x16x32	1	97	97
King Head & Foot boards	1	106	106
Queen Head & Foot boards	1	106	106
Nightstands	7	38	266
Dresser	1	109	109
Used King & Queen Mattress Set	2	25	50
Leather Sofa	2	168	335
Washer & Dryer set	1	125	150
55" TV	1	75	75

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1,893

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