

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 PERSONAL PROPERTY FREE AND CLEAR OF ALL LIENS, CLAIMS AND
ENCUMBRANCES TO STEVEN FREITAG**

**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
Personal Property Free and Clear of All Liens, Claims and Encumbrances to Steven Freitag, 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 asset proposed to be sold is personal property described as residential furniture from one of the rental properties located in Carlsbad, New Mexico. The real properties are being sold and the furniture is being marketed for sale. The Debtor believes that the furniture is worth approximately \$12,000.00; the residential furniture is not subject to any liens or claims to creditors to the best of the Debtor's knowledge. A copy of the furniture to be sold is attached hereto as Exhibit "A".

3. The Debtor proposes to sell the personal property to Steven Freitag (whom is not related to the Debtor) for a lump sum cash payment in the amount of \$12,000.00.

4. The Debtor believes that the proposed sale of the furniture generates a reasonable value based upon the asset proposed to be sold and its marketability.

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

6. The Debtor is requesting that the sale of the furniture as described in Exhibit "A" attached hereto to Steven Freitag be free and clear of all liens, claims and encumbrances pursuant to §363 of the U.S. Bankruptcy Code.

7. 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 personal property set forth on Exhibit "A" attached hereto to Steven Freitag in exchange for a lump sum cash payment in the amount of \$12,000.00, pursuant to the terms set forth above, and for such other and further relief to which the Debtor may show itself entitled.

Date: February 20, 2017.

Respectfully submitted,

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

Attorneys for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on February 20, 2017, a true and correct copy of the above and foregoing instrument was mailed, first class, postage prepaid to the attached notice list.

/s/ William R. Davis, Jr.
WILLIAM R. DAVIS, JR.

Label Matrix for local noticing
0542-5
Case 16-52748-rbk
Western District of Texas
San Antonio
Mon Feb 20 15:36:40 CST 2017

Advanced Solids Control, LLC
5655 Bear Lane, Suite 100
Corpus Christi, TX 78405-4407

U.S. BANKRUPTCY COURT
615 E. HOUSTON STREET, ROOM 597
SAN ANTONIO, TX 78205-2055

A-Terry's Plumbing Heating & AC, Inc.
P.O. Box 9714
Midland, TX 79708-9714

A. G. Adjustments, Ltd.
740 Walt Whitman Rd.
Melville, NY 11747-2212

ASK Environmental Equipment
20504 Enfield Ave. N.
Forest Lake, MN 55025-8135

AT&T Mobility
P.O. Box 6463
Carol Stream, IL 60197-6463

American Ad Valorem Tax Consultants
P.O. Box 6330
Corpus Christi, TX 78466-6330

American Medical Group Carlsbad
2410 N. Fowler
Hobbs, NM 88240-2312

Atmos Energy
P.O. Box 790311
St. Louis, MO 63179-0311

Atmos Energy Corporation
Attn: Bankruptcy Group
PO Box 650205
Dallas TX 75265-0205

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

Best Western Stevens Inn
PO Box 580
Carlsbad NM 88221-0580

Big Dog - Rig Movers
7500 W. Hwy. 80
Midland, TX 79706-2856

Billy Jackson
107 Mississippi St
Mansfield LA 71052-4228

Cain Electrical Supply
P.O. Box 16489
Fort Worth, TX 76162-0489

Carlsbad Irrigation District
5117 Grandi Road
Carlsbad, NM 88220-8931

Chamberlain Enterprises, LLC
205 Raymond St.
Carlsbad, NM 88220-9696

City of Carlsbad
P.O. Box 1569
Carlsbad, NM 88221-1569

City of Midland
P.O. Box 1152
Midland, TX 79702-1152

Comdata Inc
5301 Maryland Way
Brentwood, TN 37027-5028

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

DNOW LP
7402 N. Eldridge PKWY
Houston, TX 77041-1902

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

Darin Merle Harding
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P.O. Box 105249
Atlanta, GA 30348-5249

Eddy County Treasurer
101 W. Greene, Suite 117
Carlsbad, NM 88220-6258

First Insurance Funding Corp.
P.O. Box 66468
Chicago, IL 60666-0468

First National Bank of Beeville
1400 E. Houston St.
Beeville, TX 78102-5380

Fluid Audience, Inc.
102-10001-101 Avenue Grande Prairie
AB T8V 0X9 Canada

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

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c/o Robert L. Barrows
Warren, Drugan & Barrows, P.C.
800 Broadway
San Antonio, TX 78215-1517

Frost National Bank
100 W. Houston Street
San Antonio, TX 78205-1400

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Bach Springs, TX 75180-2205

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Portland, TX 78374-4001

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

Harvey Rodriguez
215 E Elm St
Loving NM 88256

Industrial Electric Motors, Inc.
P.O. Box 926
Carlsbad, NM 88221-0926

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

JB Electric LLC
PO Box 171
Carlsbad NM 88221-0171

Jason Moss
19879 CR 431
Uvalde TX 75771-5703

John Paul Lopez
PO Box 223
Loving NM 88256-0223

Juan Kerbow
c/o Michael D Seale
Crain Caton & James PC
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Houston TX 77010-1079

Kirby-Smith Machinery, Inc.
P.O. Box 270360
Oklahoma City, OK 73137-0360

Komatsu Southwest
P.O. Box 842326
Dallas, TX 75284-2326

LG Pest Control, LLC
2612 Mountain View
Carlsbad, NM 88220-3260

Layer One Networks, LLC
5705 Gollihar Rd., #1
Corpus Christi, TX 78412-3109

Leaf Capital Funding, LLC
2005 Market St., 14th Floor
Philadelphia, PA 19103-7009

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Cincinnati, OH 45274-2647

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Venus TX 76084-4719

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Round Rock, Texas 78680-1269

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Midland, TX 79708-0002

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Lubbock, TX 79408-0817

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Dallas, TX 75201-3302

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Carlsbad, NM 88220-5669

North Texas Tollway Authority
P.O. Box 660244
Dallas, TX 75266-0244

Nueces County
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P.O. Box 5069
Carlsbad, NM 88221-5069

PacTec, Inc.
McKenzie, Becker & Stevens, Inc.
PO Box 1967
Lakeville, CT 06039-1967

Pactec, Inc.
P.O. Box 8069
Clinton, LA 70722-1069

Prince Parker & Associates, Inc.
P.O. Box 474690
Charlotte, NC 28247-4690

Professional Communications
P.O. Box 61830
Midland, TX 79711-1830

RK Pump & Supply
11400 West County Rd. 30
Midland, TX 79707-7501

Reliant
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Rig Movers - Acme
110 North Marienfeld, Ste 200
Midland, TX 79701-4412

SLS Litigation Services, LLC
4008 Louetta Rd., Suite 233
Spring, TX 77388-4405

Sentrimax Centrifuges, Inc.
108 Sentry Drive
Mansfield, TX 76063-3608

Sotero G Robledo
PO Box 1403
Alberta T4X 0G2 Canada

Southwestern Public Service
dba Xcel Energy
Kimbra Seawright
PO Box 9477
Minneapolis, MN 55484-9477

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

State of New Mexico
Taxation & Revenue Dept
PO Box 25128
Santa Fe NM 87504-5128

State of New Mexico
Workers Comp Fee
PO Box 25128
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Austin, TX 78759-8894

TDS
Dept 0012
Palatine IL 60055-0012

TKH Services
P.O. Box 3053
Carlsbad, NM 88221-3053

Teletrac Corporation
7391 Lincoln Way
Garden Grave, CA 92841-1428

Texas Mutual Insurance Co.
P.O. Box 841843
Dallas, TX 75284-1834

The First National Bank of Beeville
c/o Ronald A. Simank
Schauer & Simank, P.C.
615 N. Upper Broadway, Suite 700
Corpus Christi, TX 78401-0857

The Water Works
113 South Canal
Carlsbad, NM 88220-5656

Tranbarger & Company, LLP
802 N. Carancahua, Suite 1660
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US Trustee's Office
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185 Asylum Street - 03B
Hartford, CT 06103-3408

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Niagara Falls, NY 14304-1745

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

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Louisville, KY 40290-1908

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(u)State of New Mexico

End of Label Matrix	
Mailable recipients	100
Bypassed recipients	1
Total	101

SCHEDULE A

<u>Quantity</u>	<u>Description</u>	
2	Sofas	
6	Kitchen Chairs	
1	Kitchen Dining Table	60 x 42 x 30
1	Cocktail Coffee Table	42 x 42 x 18
1	Media Cabinet	65 x 22 x 32
1	Entry Console	60 x 16 x 32
1	Mirror	30 x 40
3	Bar Stools	bar height
1	Bedroom Dresser	
6	Night Stands drawer/shelf	20 x 20 x 26
1	Washer	
1	Dryer	
1	LG TV	55"
8	Boxes of Kitchen Supplies, Towels, and Bedding Supplies	
1	Trash Can	
2	Queen Headboards, Footboards, Mattresses, & Frames	
2	King Headboards, Footboards, Mattresses, & Frames	