

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 AIM DIRECTIONAL SERVICES, LLC**

**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 AIM Directional Services, LLC, 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 are personal property described as residential furniture located in the real property at 5002 Oak Valley Rd., Midland, Texas. The real property is being sold and the furniture is being marketed for sale (and must be sold and/or moved). The Debtor believes that the furniture is worth approximately \$1,500.00; the furniture is not subject to any liens to creditors. Attached hereto as Exhibit "A" is a list of the furniture which is proposed to be sold herein.

3. The Debtor proposes to sell the personal property set forth on Exhibit "A" to AIM Directional Services, LLC (whom is not related to the Debtor) for a lump sum cash payment in the amount of \$1,500.00. Purchaser is picking the furniture up at the house and Debtor is avoiding any related expenses, such as moving and storing the furniture. The Debtor has not received any other interest in the furniture, and the cost to move the furniture back to Corpus Christi may exceed the value of the furniture.

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.


6. The Debtor is requesting that the sale of the furniture located at 5002 Oak Valley Dr., Midland, TX 79707 and described herein to AIM Directional Services, LLC 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 (furniture) to AIM Directional Services, LLC pursuant to the terms set forth above, and for such other and further relief to which the Debtor may show itself entitled.

Date: April 13, 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

Attorneys for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on April 13, 2017, a true and correct copy of the above and foregoing instrument was mailed, first class, postage prepaid to the attached notice list.

  
\_\_\_\_\_  
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

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

EXHIBIT "A"

Rental home furniture  
2 Queen beds and mattresses  
Tables and stools  
Love seat, tables, chairs  
2 televisions  
Samsung television  
Washer and dryer