

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 AT 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
Personal Property Free and Clear of All Liens, Claims and Encumbrances at 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 asset proposed to be sold consists of personal property described as residential furniture from multiple rental properties the Debtor owns in New Mexico. The real properties are being sold and the furniture must be liquidated. The Debtor believes that the furniture is worth approximately \$35,000.00; the residential furniture is not subject to any liens or claims to creditors.

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. The Consignment Agreement was for a term of ninety (90) days (from January 3, 2017), and payment is due to the Debtor within thirty (30) days from the sale of the item(s). The Order Granting Authority to Sell Personal Property Free and Clear of All Liens, Claims and Encumbrances pursuant to the Consignment Agreement with H. Lancaster Co. was entered on February 6, 2017.

4. H. Lancaster Co. has not completed a sale of the furniture, but has inspected the furniture and is prepared to include the furniture in a tent sale that is upcoming. The Debtor is requesting that H. Lancaster Co. authorization to sell the furniture pursuant to the Consignment Agreement is extended to July 31, 2017.

5. In conjunction with the proposed consignment sale by H. Lancaster Co., the Debtor is proposing to sell the miscellaneous items of furniture as set forth herein on Exhibit "A" for the minimum prices set forth on Exhibit "A".

6. Some of the furniture is more worn than others, and some has cracks from the dry climate in New Mexico.

7. The Debtor's plan is to sell as much furniture as it can on its own and obtain the best price (hopefully in excess of the minimum prices set forth on Exhibit "A") before moving the remaining furniture to H. Lancaster Co. for sale pursuant to the Consignment Agreement.

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

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

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

11. 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 at the minimum prices set forth on Exhibit "A" and pursuant to the terms set forth above, and for such other and further relief to which the Debtor may show itself entitled.

Date: May 5, 2017.

Respectfully submitted,



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 May 5, 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

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
17th 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

Furnishings Per House	In Stock	Apr 12 2017		Cost each	Cost Total	20%	
Dining Table	4			\$ 980	\$ 3,920	\$ 196	\$ 784
Dining Chairs	24			\$ 149	\$ 3,576	\$ 30	\$ 715
Barstools	12			\$ 249	\$ 2,988	\$ 50	\$ 598
55" TV	3			\$ 736	\$ 2,208	\$ 147	\$ 442
Media Cabinet 65x22x32	3			\$ 1,088	\$ 3,264	\$ 218	\$ 653
Cocktail Table 42x42x18	4			\$ 648	\$ 2,592	\$ 130	\$ 518
End table 20x20x26	4			\$ 380	\$ 1,520	\$ 76	\$ 304
Console Table 60 x16x38	3			\$ 964	\$ 2,892	\$ 193	\$ 578
Entry Console Table 60x16x32	3			\$ 964	\$ 2,892	\$ 193	\$ 578
Entry Mirror 30 x 40	3			\$ 289	\$ 867	\$ 58	\$ 173
King Head & Foot boards	9			\$ 1,054	\$ 9,486	\$ 211	\$ 1,897
Queen Head & Foot boards	8			\$ 1,054	\$ 8,432	\$ 211	\$ 1,686
Nightstands	32			\$ 380	\$ 12,160	\$ 76	\$ 2,432
Dresser	4			\$ 1,084	\$ 4,336	\$ 217	\$ 867
King Mattresses Sets	8		Luxury III 2 sided plush flip	\$ 1,307	\$ 10,456	\$ 261	\$ 2,091
Queen Mattresses Sets	7		Luxury III 2 sided plush flip	\$ 612	\$ 4,284	\$ 122	\$ 857
Leather sofas	8			\$ 1,674	\$ 13,392	\$ 335	\$ 2,678
Washer & Dryer sets	4					\$ 250	\$ 1,000
32" TV (extra)							
					\$ 89,265		\$ 18,853
			heat damage - coffee tables, media tables, dining tables				

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ADVANCED SOLIDS CONTROL, LLC	X	CASE NO. 16-52748-RBK
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**ORDER GRANTING ADVANCED SOLIDS CONTROL, LLC AUTHORITY TO SELL
PERSONAL PROPERTY FREE AND CLEAR OF ALL LIENS, CLAIMS AND
ENCUMBRANCES AT MINIMUM PRICES**

On this day, came on to be considered the Motion of Advanced Solids Control, LLC for Authorization to Sell Personal Property Free and Clear of All Liens, Claims and Encumbrances at Minimum Prices, and it appearing to the Court that proper notice has been given to all parties and that no objections to the proposed sale have been filed, and further that such sale is in the best interest of the Debtor and its creditors, and accordingly, the Motion should be granted; it is therefore

ORDERED, ADJUDGED and DECREED that the Debtor is hereby granted authority to sell the personal property set forth on Exhibit "A" attached hereto for minimum prices and pursuant to the terms set forth in the Motion to Sell; it is further

ORDERED, ADJUDGED and DECREED that the sale of the furniture at the minimum prices set forth on Exhibit "A" is free and clear of all liens, claims and encumbrances pursuant to §363 of the U.S. Bankruptcy Code; it is further

ORDERED, ADJUDGED and DECREED that the time period for H. Lancaster Co. to sell the items set forth on Exhibit "A" pursuant to the terms of the The Order Granting Authority to Sell Personal Property Free and Clear of All Liens, Claims and Encumbrances pursuant to the Consignment Agreement with H. Lancaster Co. was entered on February 6, 2017; and it is further

ORDERED, ADJUDGED and DECREED that the Debtor has no liens against the furniture, and the Debtor is authorized to use the net sales proceeds to assist it with its reorganization efforts herein and the payment of creditors of the Estate.

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Submitted by:

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