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Attorneys for Debtor(s)

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**IN RE: § CASE NO. 417-41675-RFN-11**  
**§**  
**BAY CITY RECYCLING, LLC §**  
**§**  
**DEBTOR(S) § CHAPTER 11 BANKRUPTCY**

**MOTION TO SELL INTEREST**

**NOTICE IS HEREBY GIVEN THAT:**

**NO HEARING WILL BE CONDUCTED UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE U.S. BANKRUPTCY COURT AT ELDON B. MAHON U.S. COURTHOUSE, ROOM 147, 501 W. 10TH STREET, FORT WORTH, TEXAS 76102-3643, BEFORE 4:00 O'CLOCK P.M.ON NOVEMBER 6, 2017 WHICH IS AT LEAST TWENTY ONE (21) DAYS FROM THE DATE OF SERVICE HEREOF.**

**ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF AN OBJECTION IS FILED A HEARING WILL BE SCHEDULED WITH NOTICE ONLY TO THE OBJECTING PARTY.**

**IF NO OBJECTION IS TIMELY FILED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN**

**TO THE HONORABLE RUSSELL F. NELMS, U.S. BANKRUPTCY JUDGE:**

**COMES NOW, BAY CITY RECYCLING, LLC, Debtor(s) in the above styled and numbered case, and files this Motion to Sell Interest, and support hereof, would respectfully show the Court as follows:**

**I.**

The Debtor filed a voluntary petition under Chapter 11 of Title 11 of the United States

Bankruptcy Code on 4/24/2017.

**II.**

The Court has jurisdiction pursuant to 28 U.S.C. §1334 and §157(b). This is a core proceeding.

**III.**

The Debtor respectfully requests the Court to grant it authorization to sell interest in Caterpillar 242D SKID STEER LOADER, SERIAL NO. DZT01550 and Caterpillar 242D SKID STEER LOADER, SERIAL NO. DZT01552. This will allow the Debtor to be free and clear of this lien and allow it to continue the reorganization under its Chapter 11 Bankruptcy.

**WHEREFORE, PREMISES CONSIDERED,** Debtor prays the Court will grant the relief requested herein and for such other and further relief the Debtor may show itself justly entitled.

Respectfully submitted,

/s/ Craig D. Davis  
RONALD W. ROBERTS  
State Bar No. 17018600  
CRAIG D. DAVIS  
State Bar No. 00793588  
JEFFREY W. ERMIS  
State Bar No. 24032159  
1010 N. Center, Suite 1000  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument was this the October 13, 2017, served upon all parties-in-interest listed on the Debtors mailing matrix via electronic mail and/or first class mail.

      /s/      Craig D. Davis  
RONALD W. ROBERTS  
CRAIG D. DAVIS  
JEFFREY W. ERMIS



8100 Business 287  
Kennedale, Texas 76060

October 10, 2017

THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION  
CHAPTER II  
CASE NO. 17-41675-rfn11  
DEBTOR: Bay City Recycling, LLC

Attention: CRAIG D. DAVIS  
DAVIS, ERMIS & ROBERTS, P.C.  
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Attention: John M. Castillo  
FARRIMOND CASTILLO & BRESNAHAN, P.C.  
ATTORNEYS FOR CATERPILLAR FINANCIAL SERVICES  
130 E. Travis, Suite 350  
San Antonio, Texas 78205  
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**Regarding The Following Order:**

ORDER ON CATERPILLAR FINANCIAL 242D skid steer units.  
CATERPILLAR 242D SKID STEER LOADER, SERIAL NO. DZT01550 AND CATERPILLAR 242D SKID STEER  
LOADER, SERIAL NO. DZT01552

**Offer:**

Now comes before the Court, Fast Cash Recycling Centers, LLC motion to purchase two Caterpillar 242D Skid Steer Loaders for the cash price of \$19,500.00 each totaling \$39,000.00 from Bay City Recycling, LLC Debtor in Possession Case No 17-41675-rfn11 at 6731 Bridge Street STE 410 Fort Worth, TX 76112. This equipment is needed for Fast Cash Recycling Centers, LLC operation to help victims of Hurricane Harvey.

This is a cash offer for the following Equipment:  
Caterpillar 242D Skid Steer Loader – Serial Number DZT01550  
Caterpillar 242D Skid Steer Loader – Serial Number DZT01552

This offer is good for 3 days from October 10, 2017.

Sincerely,

Timon White/President  
Fast Cash Recycling, LLC