

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
	:	CHAPTER 11
E. ALLEN REEVES, INC.,	:	
	:	BANKRUPTCY NO. 17-11354
Debtor.	:	
	:	

**MOTION OF E. ALLEN REEVES, INC. FOR AN ORDER (I) PURSUANT TO
11 U.S.C. §§ 105(A) AND 363 AND FEDERAL RULES OF BANKRUPTCY
PROCEDURE 2002, 6004 AND 9013 AUTHORIZING AN AUCTION AND
THE SALE OF ASSETS FREE AND CLEAR OF LIENS, CLAIMS AND
ENCUMBRANCES; (II) GRANTING EXPEDITED RELIEF;
AND (III) GRANTING RELATED RELIEF**

E. Allen Reeves, Inc. (the “Debtor”), by and through undersigned counsel, Ciardi Ciardi & Astin, hereby submits this motion for the entry of an order authorizing an auction and the sale of assets, described herein, free and clear of liens, claims and encumbrances, granting expedited relief, and granting related relief (the “Motion”), and, in support thereof, respectfully avers as follows:

JURISDICTION

1. The Court has jurisdiction over this proceeding pursuant to 28 U.S.C. §§ 157 and 1334. This is a “core” proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (M), (N) and (O). Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief requested herein are §§105 and 363 of the Bankruptcy Code and Federal Rules of Bankruptcy Procedure 2002, 6004 and 9013.

BACKGROUND

2. On February 27, 2017 (the “Filing Date”), the Debtor filed a voluntary petition for reorganization pursuant to chapter 11 of title 11 of the United States Code, as amended (the “Bankruptcy Code”).

3. Since the Filing Date, the Debtor has remained in possession of its assets and continued management of its business as a debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

4. An official committee of unsecured creditors (the "Committee") has not yet been appointed by the Office of the United States Trustee.

5. The Debtor, founded in 1918, was a commercial and residential contractor in Pennsylvania and New Jersey.

6. The Debtor has ceased operations and seeks to liquidate its remaining assets. On May 18, 2017, the Debtor filed a Motion to Sell Vehicles and Miscellaneous Assets Free of Liens, Claims, and Encumbrances (the "Initial Sale Motion"). See Docket Item 147. A hearing on the Initial Sale Motion is scheduled for June 21, 2017 at 11:00 a.m.

7. On May 18, 2017, the Debtor retained Quaker City Auctioneers, Inc. (the "Auctioneer") by order of the Bankruptcy Court to sell all of the Debtor's remaining assets at auction (the "Assets"). See Docket Item 146.

8. The online sale of the Assets is scheduled for Monday, June 19, 2017 at 9:00 a.m. and bidding closes Thursday, June 22, 2017 at 12:00 p.m. The live sale date is Tuesday, June 20, 2017 at 9:30 a.m. and will take place at 2860 Memphis Street, Philadelphia, Pennsylvania 19134. The live sale together with the the online sale will be referred to herein as the "Auction". A **draft** of the Auction Notice is attached hereto as **Exhibit A**.

9. As of the Filing Date, the Debtor owned, and continues to own, the Assets.

10. The proceeds from the sale of the Assets by the Auctioneer will be utilized by the Debtor to fund its Liquidating Plan and pay creditors.

11. The Debtor avers that, with the sale of the Assets as is contemplated by the Auctioneer, the Debtor will generate funds to distribute to unsecured creditors under its Liquidating Plan.

THE BASIS FOR RELIEF AND THE REASONS THEREFOR

12. By this Motion, the Debtor seeks the entry of an order by the Court:

a) at the Sale Hearing pursuant to section 363 of the Bankruptcy Code approving the Auction and ultimate sale of the Assets (the "Sale Approval Order").

13. The reasons and authority for the entry of the Sale Approval Order are discussed in detail in the Motion.

THE SALE APPROVAL ORDER

14. The Debtor seeks the entry of an order pursuant to section 363 of the Bankruptcy Code, approving the Auction and the sale of the Assets in all respects, free and clear of any and all liens, claims, encumbrances and interests in the Assets.

15. Pursuant to section 541 of the Bankruptcy Code, the property to be sold to the buyers as a result of the auction process (the "Sale"), is that of the Debtor's bankruptcy estate.

16. In accordance with sections 363, 1107 and 1108 of the Bankruptcy Code, debtors-in-possession are authorized to sell property of the estate and maximize recoveries for creditors.

17. Section 363(b) of the Bankruptcy Code authorizes a debtor or a trustee to sell its assets outside of the ordinary course of business. See 11 U.S.C. § 363(b)(1).

18. Section 363(f) of the Bankruptcy Code provides, in pertinent part, as follows:

(f) [t]he trustee may sell property under subsection (b) or (c) of this section free and clear of any interest in such property of an entity other than the estate, only if –

(1) applicable nonbankruptcy law permits sale of such property free and clear of such interest;

(2) such entity consents;

(3) such interest is a lien and the price at which such property is to be sold is greater than the aggregate value of all liens on such property;

(4) such interest is in bona fide dispute; or

(5) such entity could be compelled, in a legal or equitable proceeding, to accept a money satisfaction of such interest.

11 U.S.C. § 363(f).

19. Generally, a debtor must show that each of the following elements have been met before a section 363(b) sale may be approved: (i) that a sound business reason exists for the proposed transaction; (ii) that the sale has been proposed in good faith; (iii) that the sale price is fair and reasonable; and (iv) that accurate and reasonable notice has been provided of the transaction. See In re WDH Howell, LLC, 298 B.R. 527, 534 (D. N.J. 2003); In re Stroud Ford, Inc., 163 B.R. 730 (Bankr. M.D. Pa. 1993).

20. Although section 363 of the Bankruptcy Code does not specify a standard for determining when it is appropriate for a court to authorize the use, sale or lease of property of the estate, bankruptcy courts routinely authorize sales of a debtor's assets if such sale is based upon the sound business judgment of the debtor. In re Dura Automotive, 2007 Bankr. LEXIS 2764 at *258, (citing Myers v. Martin (In re Martin), 91 F.3d 389, 395 (3d Cir. 1996)); Comm. of Equity Sec. Holders v. Lionel Corp. (In re Lionel Corp.), 722 F.2d 1063, 1070 (2d Cir. 1983); In re Abbotts Dairies of Penn., Inc., 788 F.2d 143 (3d Cir. 1986) (implicitly adopting the "sound business judgment" test of Lionel Corp. and requiring good faith); In re Del. And Hudson Ry. Co., 124 B.R. 169 (D. Del. 1991) (concluding that the Third Circuit adopted the "sound business judgment" test in

the Abbotts Dairies decision); In re Montgomery Ward Holding Corp., 242 B.R. 147, 153 (D. Del. 1991) (same).

21. Courts have made it clear that a debtor's showing of a sound business justification need not be exhaustive, but rather a debtor or trustee is "simply required to justify the proposed disposition with sound business reasons." In re Baldwin-United Com., 43 B.R. 888, 906 (Bankr. S.D. Ohio 1984).

22. Whether or not there are sufficient business reasons to justify a sale depends upon the facts and circumstances of each case. In re Lionel Com., 722 F.2d 1063, 1071 (2d Cir. 1983).

23. In the circumstances of valid business justifications, applicable principles of law attach to a debtor's decision a strong presumption "that in making a business decision[,] the directors of a corporation acted on an informed basis, in good faith and in the honest belief that the action taken was in the best interests of the Property." Official Comm. of Subordinated Bondholders v. Integrated Res., Inc. (In re Integrated Res., Inc.), 147 B.R. 650, 656 (S.D.N.Y. 1990) (holding that the Delaware business judgment rule has "vitality by analogy" in chapter 11), (quotations omitted).

24. Therefore, the Debtor submits that the decision to sell the Assets is based upon its sound business judgment and should be approved. The Debtor is no longer operating and so its operations will not be diminished by the sale of the Assets at the Auction by the Auctioneer. The Debtor thus believes that the sale of the Assets will provide the best result for its estate and creditors.

25. Once a court is satisfied that there is a sound business justification for the proposed sale, the court should then determine whether (i) the debtor in possession has provided the interested parties with adequate and reasonable notice, (ii) the sale price is fair and reasonable, and (iii) the purchaser is proceeding in good faith. In re Del. and Hudson Ry. Co., 124 B.R. at 166; accord In re Decora Indus., Inc., Case No. 00-4459, 2002 WL 32332749, at *3 (Bankr. D. Del. May 20, 2002.).

26. “The requirement that a purchaser act in good faith...speaks to the integrity of his conduct in the course of the sale proceedings.” In Re Abbotts Dairies of Pennsylvania, Inc., 788 F.2d 142, 147 (3d Cir. 1986). “Typically, the misconduct that would destroy a purchaser’s good faith status at a judicial sale involves fraud, collusion between the purchaser and other bidders or the trustee, or an attempt to take grossly unfair advantage of other bidders.” Id.

27. Here, the auction of each asset will be negotiated at arm’s length by the Auctioneer on behalf of the Debtor.

28. The buyers will not be controlled by, or acting on behalf of any insider of the Debtor.

29. Thus, the Debtor submits that the proposed Auction and Sale constitute sales in good faith and for fair value within meaning of Section 363 of the Bankruptcy Code and, specifically, should be afforded the benefits and protections provided by section 363(m) of the Bankruptcy Code in connection with the sale of the Assets. See id.

30. Section 363(m) of the Bankruptcy Code protects the sale of a debtor’s property to a good faith purchaser. Section 363(m) provides,

The reversal or modification on appeal of an authorization under subsection (b) or (c) of this section of a sale or lease of property does not affect the validity of a sale or lease under such authorization to an entity that purchased or leased such property in good faith, whether or not such entity knew of the pendency of the appeal, unless such authorization and such sale or lease were stayed pending appeal.

11 U.S.C. §363(m).

31. Section 363(m) of the Bankruptcy Code thus protects the good faith purchaser of assets sold pursuant to section 363 of the Bankruptcy Code from the risk that it will lose its interest in the purchased assets if the order allowing the sale is reversed on appeal. By its terms, section 363(m) of the Bankruptcy Code applies to sales of interests in tangible assets. Additionally, the

United States Court of Appeals for the Third Circuit (the “Third Circuit”) has indicated that section 363(m) of the Bankruptcy Code also protects the assignee of a debtor’s interest in executory contracts under Bankruptcy Code 365. See Krebs Chrysler-Plymouth, Inc. v. Valley Motors, Inc., 141 F.3d 490, 497-98 (3d Cir. 1998). In Krebs, the Court considered “whether assignments of [certain automobile dealership] franchises under section 365 are also sales of estate property subject to section 363(m).” Id. at 497. Despite the absence of an explicit reference to assignments of executory contracts under section 365 of the Bankruptcy Code, the Court in Krebs concluded that section 363(m) of the Bankruptcy Code protected an assignment of a debtor’s interest in certain automobile franchise agreements pursuant to an auction sale. Like the franchise agreements protected in Krebs, the Debtor respectfully submits that section 363(m) applies to protect the successful buyers at the Auction with respect to the Assets and any ancillary assignments thereof.

32. Although the Bankruptcy Code does not define “good faith,” the Third Circuit has noted that the phrase “encompasses one who purchases in ‘good faith’ and ‘for value.’” In re Abbotts Dairies of Pa., Inc., 788 F.2d 143, 147 (3d Cir. 1986). Further, the Third Circuit has recognized that the type of misconduct that would destroy a purchaser’s good faith status involves ‘fraud, collusion between the purchaser and other bidders or the trustee, or an attempt to take grossly unfair advantage of other bidders.’ Id. (remanding case involving insider transaction back to the bankruptcy court for further consideration of good faith where there was evidence that the sale had been orchestrated between insiders and some of the sale conditions were not disclosed to the debtor’s creditors) (quoting In re Rock Indus. Machine Corp., 572 F.2d 1195, 1198 (7th Cir. 1978)). Due to the absence of a bright-line test for good faith, the determination is based on the facts of each case, concentrating on the “integrity of [an actor’s] conduct during the sale proceedings.” See, e.g., In re

Stroud Ford, Inc., 163 B.R. 730, 732-33 (Bankr. M.D. Pa. 1993); In re Pisces Leasing Corp., 66 B.R. 671, 673 (E.D.N.Y. 1986) (quoting In re Rock Indus. Machine Corp., 572 F.2d at 1198).

33. As will be further demonstrated at the Sale Hearing, the sale of the Assets was proposed in good faith as a result of arms' length negotiations between the Debtor and the buyers. Under such circumstances, the Debtor submits that the buyers (or successful bidder, if not the one of the buyers) should be afforded the protections that section 363(m) of the Bankruptcy Code provides to a good faith purchaser.

34. The Debtor believes that the prompt sale of the Assets, as proposed, is in the best interests of the creditors and the estate.

35. The sale of each of the Assets should be free and clear of any and all liens, claims, and encumbrances in accordance with section 363(f) of the Bankruptcy Code, with holders of any such liens, claims and encumbrances being paid from the proceeds of the Sale of the Assets and/or being given replacement liens, claims, and encumbrances attaching to the proceeds of the Sale of the Assets.

36. Pursuant to section 363(f) of the Bankruptcy Code, a debtor in possession may sell property of the estate "free and clear of any interest in such property of an entity other than the estate" if any one of the following conditions is satisfied:

- (a) applicable nonbankruptcy law permits sale of such property free and clear of such interest;
- (b) such entity consents;
- (c) such interest is a lien and the price at which such property is to be sold is greater than the aggregate value of all liens on such property;
- (d) such interest is in bona fide dispute; or

- (e) such entity could be compelled, in a legal or equitable proceeding, to accept a money satisfaction of such interest.

11 U.S.C. §363(f).

37. The Debtor requests that the Court authorize the Sale of the Assets free and clear of all liens, claims, encumbrances, and other interests (collectively, the “Liens and Claims”). All parties in interest (if any) will be given sufficient opportunity to object to the relief requested herein and any such entity that does not object to the Sale of the Assets should be deemed to have consented. See Futuresource LLC v. Reuters Ltd., 312 F.3d 281, 285-86 (7th Cir. 2002) (“It is true that the Bankruptcy Code limits the conditions under which an interest can be extinguished by a bankruptcy sale, but one of those conditions is the consent of the interest holder, and lack of objection (provided of course there is notice) counts as consent. It could not be otherwise; transaction costs would be prohibitive if everyone who might have an interest in the bankrupt’s assets had to execute a formal consent before they could be sold.”) (internal citations omitted); Hargrave v. Twp. of Pemberton (In re Tabone, Inc.), 175 B.R. 855, 858 (Bankr. D.N.J. 1994) (failure to object to sale free and clear of liens, claims and encumbrances satisfies section 363(f)(2)). To the extent that no party holding a lien or claim objects to the relief requested in the Sale Approval Order, the Sale of the Assets free and clear of all liens and claims satisfies section 363(f)(2) of the Bankruptcy Code. To the extent a party holding a lien or claim objects to the relief requested in the Sale Approval Order, the Sale of the Assets free and clear of such liens and claims satisfies one or more of sections 363(f)(1) or (3)-(5), as applicable.

38. Accordingly, the Debtor requests that the Assets be transferred to their respective buyers free and clear of all liens, claims, encumbrances, and interests with the same, should they be found to exist, to attach to the net sale proceeds of the Assets.

APPROVAL OF THE AUCTION IS WARRANTED

40. The applicable principle of law with respect to the approval of asset sales in bankruptcy is stated in the case of In re Lionel Corp., 722 F.2d 1063 (2d Cir. 1983). The Court in Lionel held that approval of a sale is appropriate if the court finds the transaction represents a reasonable business judgment on the part of the debtor. See also, Stephens Industries v. McClung, 789 F.2d 3863 (6th Cir. 1986); In re Coastal Industries, Inc., 63 B.R. 361 (Bankr. N.D. Ohio 1986), In re Baldwin United Corp., 43 B.R. 888 (Bankr. S.D. Ohio 1984).

41. In light of the foregoing, the Debtor has determined that the Sale and Auction of the Assets on the terms and conditions set forth in the Auction Notice (and subsequent drafts thereof) are appropriate and in the best interest of its estate and all parties in interest.

REQUEST FOR EXPEDITED RELIEF

42. The Debtor requests expedited treatment in connection with the Motion prior to June 19, 2017 because it requires the immediate authorization of the Bankruptcy Court in order to sell the Assets at the Auction. The Debtor therefore requests the Court schedule a hearing on the Motion for June 14, 2017 at 11:00 a.m.

43. As of the filing of this Motion, no trustee, examiner or creditor's committee has been appointed in this Chapter 11 case.

44. No previous request for the relief sought herein has been made to this or any other Court.

45. Prior to filing this Motion, counsel for the Debtor contacted the Counsel for the Office of the United States Trustee and to advise him of the request for an expedited hearing and the relief requested therein. Counsel for the Office of the United States Trustee had no objection to the request for expedited treatment of the Motion.

46. The Debtor proposes to provide Notice of this Motion via facsimile or electronic mail to the Office of the United States Trustee and counsel for Arch Insurance Company as well as the Debtor's Top Twenty Unsecured Creditors and the Taxing Authorities.

47. The Debtor submits that no other notice need be given in light of the exigencies of the circumstances and the irreparable harm to the Debtor, its estate and all parties in interest that would ensue if the relief requested herein is not granted.

WHEREFORE, the Debtor respectfully request that this Court (i) enter an Order approving the auction and sale of the Assets in a form substantially similar to the attached proposed form of Order, (ii) enter an Order approving the sale of the Assets at auction free and clear of liens, claims, encumbrances and interest; (iii) enter an order scheduling an expedited hearing on the Motion; and (iv) grant such other and further relief as this Court deems just.

CIARDI CIARDI & ASTIN

Dated: June 2, 2017

By: /s/ Albert A. Ciardi, III
Albert A. Ciardi, III, Esquire
Jennifer C. McEntee, Esquire
One Commerce Square, Suite 3500
2005 Market Street
Philadelphia, PA 19103
Telephone: 215-557-3550
Facsimile: 215-557-3551
aciardi@ciardilaw.com
jcranston@ciardilaw.com

Counsel to the Debtor

EXHIBIT A



Phone 215.426.5300
Fax 215.426.6897
www.quakercityauction.com

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LIVE/WEBCAST & ONLINE BANKRUPTCY AUCTION E. ALLEN REEVES, INC. NO. 17-11354

LIVE/WEBCAST AUCTION

Tuesday, June 20th at 9:30 am

For purposes of sale, the assets in **black type** moved to 2860 Memphis Street, Phila., PA

Inspection: Monday, June 19th, 8:30 am - 4:00 pm

Assets in blue type to be sold online only

from 1145 Old York Road, Abington, PA

Bidding Opens: Monday June 19th at 9:00 am

Bidding Closes: Thursday, June 22nd at 12:00 noon

Inspection: Friday, June 16th, 9:00 am - 3:00 pm at 11:45 Old York Road, Abington, PA

Quaker City Auctioneers' Live/Webcast & Online 2-Part Contractor Bankruptcy Auction

E. Allen Reeves, Inc. No. 17-11354

LIVE/WEBCAST AUCTION

Tuesday, June 20th at 9:30 am

For purposes of sale, the assets in **black type** moved to 2860 Memphis Street, Phila., PA

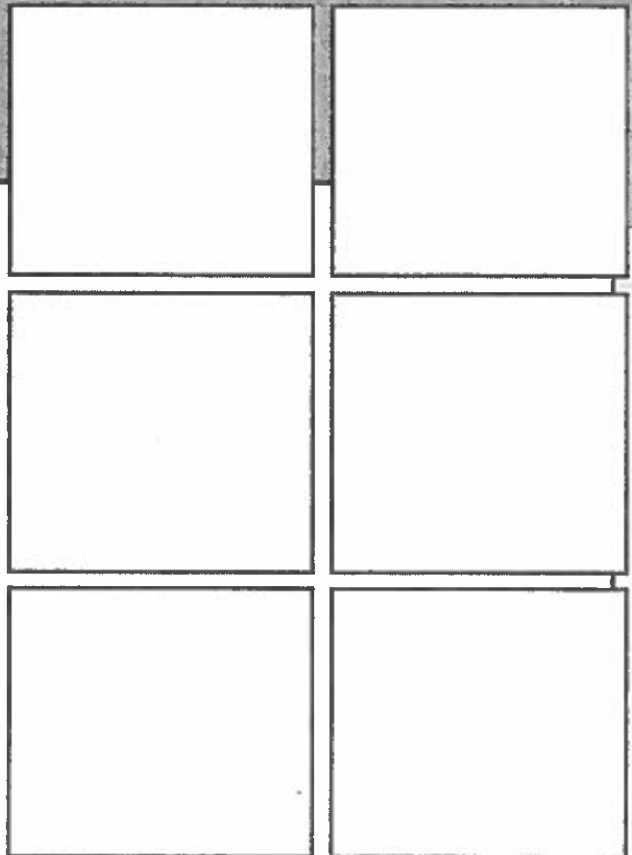
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Bidding Closes: Thursday, June 22nd at 12:00 noon

Inspection: Friday, June 16th,
9:00 am - 3:00 pm at 11:45
Old York Road, Abington, PA



QUAKER CITY AUCTIONEERS Exhibit A Page 3 of 3 **Live/Webcast & Online only****2-Part Contractor Bankruptcy Auction – E. Allen Reeves****Live/Webcast – Tuesday, June 20th at 9:30 am****Online Only – Opens Monday, June 19th, 9:00 am****Begins Closing Thursday, June 18th at 12:00 noon****LIVE/WEBCAST SEGMENT: at 2860 Memphis St., Phila, PA**

TRUCKS -2013 CHEVY Silverado 1500 Z71 4-WD Ext. Cab P/Up (70K) • 2010 CHEVY Silverado 2500 4-WD w/WESTERN snow plow (62K) • (5) 2016 CHEVY Silverado 1500 P/Ups (15K – 38K) • (2) 2013 & (1) 2012 CHEVY Silverado 1500 P/Ups (95K & 142K) • (2) 2013 & (2) 2011 CHEVY Silverado (Ext. Cab) 1500 P/Ups (81K -187K) • 2002 & 2004 CHEVY Silverado P/Ups (200K+) • (3) 2014 FORD Explorers 4-WD (60K – 91K) • 2008 SUBARU Forester A-WD (157K) • 2007 CHEVY Trailblazer (187K) • 2000 GMC 3500 w/Liftgate & 1994 CHEVY 3500 12' Stakebodies • 2008 INTERNATIONAL Durastar 4400 MaxxForce 24' Box Truck w/Liftgate (281K) • 2004 GMC W3500 COE SA 14' Box Truck w/ Liftgate (K) • (2) 2008 FRANKLIN CM612CC & 1999 AVENGER 18' TA Enclosed Utility Trailers

CONSTRUCTION EQUIPMENT– CATERPILLAR 252 Skid Steer Loader, Enclosed Cab, X-tra valves, forks & bucket 1950 hrs • NEW HOLLAND LS 180 Skid Steer Loader, Enclosed Cab, X-tra valves, Forks, Bucket, 1250 hrs • CATERPILLAR BP18 Hyd. Broom & MAJOR 84" Broom Attns • 1997 LULL 844C-42 Telehandler Fork Lift, 8000 LBS Cap, 44' Lift, 6048 hrs. • KOHLER 60 Diesel Generator w/SA Trailer • Port. Diesel Air Compressor w/SA Trailer • WACKER NEUSON Jumping Jacks • GENERAL Gas Auger w/6" – 12" Bits

TOOLS – (20) DEWALT 10" Table Saws w/Saw Stands, (20) DEWALT 12" Sliding Compound & (20) Miter Saws, (100) Circular, Jlg, Sawzall, Saber & Port. A-Band Worm Drive Electric & Cordless Saws, (7) STIHL Gas Cut-Off Saws, Hole Saws, Blades, (25) Saw & Planer Stands, Wet Tile Saws & Track Saws • (4) Core & Magnetic (100) Electric & Cordless Rotary Hammers, Hammer ½" & Rt. Angle Drills, (40) Screw Guns, (7) BOSCH Demo Hammers, (20) Core Drill Bits to 8", Drill & Hammer Bits • (20) Plunge & Trim Routers, Hinge Butt Kits, Lock & Mortising Lock Jigs • (60) BOSCH & DEWALT 7" & 4 ½" Grinders • (55) Belt, Palm & Orbital Sanders • (3) Bench Jointers, (15) Power & Surface Planers • (50) Powder Actuated Tools • (125) SENCO, PASLODE & DEWALT Air, Power & Cordless Brad, Trim, Framing, Joist, Hanger Coil Roof, Pin Steel Stud Coil, TRACKFAST, CO2 & Underlayment Nailers • (20) Asst. Portable Air Compressors, Regulators, Air Lines • (15) Asst. Generators to 11,000 Watts • (40) JOBOX & KNAACK Extra HD 2-Door Cabinets, Piano Boxes & Chests • Quick Grip Clamps • (25) Shop Vacs & (15) Upright Vacs • (11) Gas & Electric Power Washers • Wrenches, Bolt Cutters, Grease Epoxy & Heat Guns • Moisture & Sound Meters • Suction Cups, (8) Drywall Carts, Metal Stud Cutters, Pole Sanders, Roto Zip Tools, Levels & T-Squares • (200) Extension Cords • Safety Harnesses, Self-Retracting 60 Life Line, Safety Lanyards, Roof Anchor

Points, Fall Technology Apparatus • (30) DEWALT Self-Leveling Lasers, Asst. Lasers, Tri-Pods, Range Meters, Laser Receiver Target, Level Rods, Digital Transits, Auto Levels, Measuring Wheels.

ALUMINUM BRAKES – PRO-TRIM 10'-6" & TAPCO PRO 111-C 8'-6"

CONCRETE EQUIPMENT – BullFloats, Concrete Breakers, Gas Screed, Power Trowel, Wheel Barrows, Floor Scrapers.

LANDSCAPE – SPRAYTECH Sprayers, BILLY GOAT Leaf Blower, Chain Saws, Weedwackers, Leaf Blowers, Snow Throwers, Hoses, Power Washers

MATERIAL HANDLING – Nylon Straps, Chokers & Slings, Chain Hoists, Come-Alongs, Hydraulic, Floor, Screw & Bottle Jacks, Panel Carts, Jack Stands, Suction Cups, Hand Trucks, Dollies, etc.

PLUMBING – Hi-Pressure, Sump & Trash Pumps, Hoses,

MISC. – Roofing Tools, Lighting, Safety Supplies, First Aid Supplies, Tools, Impact, Pipe, Adj. & Box Wrenches

ONLINE SEGMENT: 1145 Old York Road, Abington, PA

EQUIPMENT – (2) 20' Storage Containers, Flammable Liquid Cabinets, Cantilever Racks, Wheel Barrows, RUBBERMAID Tipping Hoppers & Trash Cans, GUARDIAN SAFETY Molded Barriers, TRAFFIX-A-CADE Barners, Fencing, Room of Hardware & Fasteners, Shop Tool Boxes, (75) Scaffolding Frames, Braces, Casters, etc. Planks, (15) Aluminum Pics to 24', Safety Rail 2000 Bases & Rails, (20) BIL-JAX & PERRY Bakers Scaffolding, (50) Fiberglass Step 6'- 12' & Extension to 40', Ladder Jacks, Pole Jack Braces; YARD TOOLS – Rakes, Shovels, Brooms, Spades, Pkts Post Hole Diggers, Sledge Hammers, etc., (50) Box & Pedestal Fans to 42", Air Conditioners, Dehumidifiers, LB WHITE Propane Heaters, (90) Electric Torpedo Heaters, Maxx Floor Dryers, Negative Air Machines, Propane Pot Heaters.

Doors & Frames, Aluminum Studding, Supplies, Hardware, etc.

OFFICES – (12) BROTHER All-in-One Printers, Copiers, Scanners, (25+) CISCO 7965 VOIP Phones, POLYCOM Conference Phone, Phone Modems, HP LJ 9050n Printer, Paper Shredders, DELL PCs, Flat Screens to 22", (10+) Laptops, Server Accs., OK1 MC860 All-in-One, CANON MF7460, Drafting Digitizer, Wide-Format Paper, Fireproof & Lateral File Cabs, Seating, Conference Rooms, Modular Work Stations (free-standing), Supplies & More.

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