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This order is SIGNED.

Dated: January 17, 2018

nark.

JOEL T. MARKER **U.S. Bankruptcy Judge** 



Prepared and Submitted by:

Matthew M. Boley (8536) Steven C. Strong (6340) **COHNE KINGHORN, P.C.** 111 E. Broadway, 11<sup>th</sup> Floor Salt Lake City, UT 84111 Telephone: (801) 363-4300 E-mail: mboley@cohnekinghorn.com sstrong@cohnekinghorn.com

Proposed attorneys for debtor-in-possession MOUNTAIN CRANE SERVICE LLC

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

In re:

**MOUNTAIN CRANE SERVICE LLC.** 

Debtor.

Bankruptcy No. No. 18-20225 Chapter 11 Honorable Joel T. Marker

## PRELIMINARY ORDER AUTHORIZING THE USE OF CASH COLLATERAL

This matter came before the Court on January 16, 2018 for a preliminary hearing on the

motion for authority to use cash collateral (the "Motion") filed by debtor and debtor-in-

possession MOUNTAIN CRANE SERVICE LLC (the "Debtor"). Appearances of counsel and

of other parties-in-interest were made on the record at the hearing.

Based on the evidence received by the Court and/or adduced at the preliminary hearing on the Motion, considering the representations and statements of counsel, and the Court having

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made findings of fact and conclusions of law on the record of the hearing, which findings and conclusions are incorporated into this Order by reference, the Court hereby

## FINDS AND CONCLUDES as follows:

A. the Court has jurisdiction under 28 U.S.C. §§ 157 and 1334;

B. this is a core proceeding under 28 U.S.C. § 157(b)(2)(A), (M) and (O);

C. no examiner or trustee has been appointed in this case;

D. notice of the Motion, and of the preliminary hearing thereon, was and is, given the circumstances, adequate and proper within the meaning of 11 U.S.C. § 102(1) and Federal Rule of Bankruptcy Procedure 4001(b);

E. the expenses identified on the budget attached hereto as **Exhibit "A"** are actual and necessary costs and expenses of preserving the Debtor's chapter 11 bankruptcy estate;

F. Bank of Ann Arbor and other creditors may claim an interest in the Debtor's cash collateral;

G. to the extent that Bank of Ann Arbor and any other affected creditor (collectively, the "Affected Creditors") have an interest in the Debtor's cash and/or other assets of the Debtor which will result in cash proceeds (collectively, the "Cash Collateral"), then the Affected Creditors are adequately protected by the replacement liens and other adequate protection rights granted hereunder; and

H. the Court stated additional findings of fact and conclusions of law on the record during the hearings on the Motion, which findings and conclusions are incorporated herein by reference.

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WHEREFORE, based upon the Motion, the foregoing findings and conclusions and other matters of record, and good cause appearing, it hereby is

#### **ORDERED** that:

1. The Motion is GRANTED on a preliminary basis, as more particularly described below.

2. The Debtor is authorized to use and spend Cash Collateral to pay expenses as consistent with and identified on the budget attached hereto as **Exhibit "A"** (the "**Budget**") to the extent of the amounts reflected on the Budget for the period from January 12, 2018 through February 2, 2018. The Debtor may exceed the amounts budgeted for individual line items on the Budget by up to ten percent (10%). Further, savings in prior periods may be carried forward to permit greater expenditures in later periods.

3. Further, to the extent the Debtor obtains the express written consent of the Affected Creditors, the Debtor may use and spend Cash Collateral beyond or in addition to the amounts reflected in the Budget to pay any additional costs or expenses that arise in the ordinary course of the Debtor's business.

4. The Affected Creditors shall receive, and shall be afforded, the following rights and treatment as "adequate protection" for the Debtor's use of cash collateral (collectively, the "Adequate Protection Rights"):

a. To the extent the Debtor uses cash that constitutes "cash collateral" of the Affected Creditors within the meaning of 11 U.S.C. § 363, and then to the extent such use of cash results in a diminution, in the aggregate, in the amount of the collateral of the Affected Creditors as the same existed the date that use of cash collateral was authorized, as adequate protection for the Debtor's use of the same, the Affected Creditors hereby are granted a properly perfected security interest and replacement lien (the "**Replacement Lien**") in all pre-petition and post-petition assets of the Debtor (excepting chapter 5

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claims and the proceeds of new sales revenue) to the extent of such diminution and to the extent and nature of any liens held by the Affected Creditors already in existence.

b. The Replacement Lien granted hereunder shall attach and become valid, binding, continuing, enforceable, fully-perfected and non-avoidable by operation of law as of the Petition Date without any further action by the Debtor, the Affected Creditors, or any other person, and without the necessity of execution by the Debtor, or the filing or recordation, of any financing statements, security agreements, mortgages, deeds of trust, or other documents.

5. Nothing in this Order shall be deemed to determine the extent, validity, or priority of the alleged claims or liens of the Affected Creditors.

6. Notwithstanding anything to the contrary in this order:

a. The absence of an objection from any secured creditor with a security interest in the Debtor's equipment or collateral, including cash collateral, is not a waiver, modification or release of any rights of such secured creditor;

b. All lien rights and priorities are preserved and nothing in the order grants any adequate protection rights regarding the collateral of any other secured creditor other than a junior lien to the extent, and only to the extent, that there is any equity in such collateral and to the extent and nature of any liens held by the Affected Creditors already in existence; and

c. Nothing in the Budget precludes, limits or waives the right of any secured creditor to demand, and receive, payments in excess of the amounts, if any, specified in the Budget.

7. The authority granted by this Order shall expire on February 2, 2018, at the hour of 11:59 p.m. (Mountain Time).

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8. The Court shall hold a final hearing on February 1, 2018, at 10:00 a.m., regarding the Debtor's authority to use cash collateral through April 30, 2018.

9. At least two business days in advance of the final hearing, the Debtor shall submit to the Court, to the United States Trustee, and Bank of Ann Arbor a report of actual receipts and disbursements versus the amounts reflected in the Budget.

10. This Order shall constitute adequate and appropriate notice of the final hearing on use of cash collateral, as scheduled hereunder. The Debtor shall not be required to serve additional notice upon parties-in-interest.

11. This order is effective as of January 16, 2018, when the Court's verbal ruling was announced in open court at the conclusion of the hearing on the Motion.

----- END OF ORDER -----

# **DESIGNATION OF PARTIES TO BE SERVED**

Service of the foregoing Order shall be served to the parties and in the manner designated

below:

**By Electronic Service**: I certify that the parties of the record in this case as identified below, are registered CM/ECF users and will be served notice of entry of the foregoing Order through the CM/ECF system:

- Darwin H. Bingham dbingham@scalleyreading.net, cat@scalleyreading.net
- Matthew M. Boley mboley@cohnekinghorn.com, jhasty@cohnekinghorn.com
- Tim Dance tdance@swlaw.com, docket\_slc@swlaw.com;snielsen@swlaw.com;bhatch@swlaw.com
- Douglas Farr dfarr@swlaw.com, docket\_slc@swlaw.com;bandrews@swlaw.com
- David E. Leta dleta@swlaw.com, wkalawaia@swlaw.com;csmart@swlaw.com
- John T. Morgan tr john.t.morgan@usdoj.gov, James.Gee@usdoj.gov;Lindsey.Huston@usdoj.gov;Suzanne.Verhaal@usdoj.gov
- Nathan Seim seim.nathan@dorsey.com, ventrello.ashley@dorsey.com
- Steven C. Strong sstrong@cohnekinghorn.com, jhasty@cohnekinghorn.com
- United States Trustee USTPRegion19.SK.ECF@usdoj.gov

**By U.S. Mail**: In addition to the parties of record receiving notice through the CM/ECF system, the following parties should be served notice pursuant to Fed R. Civ. P. 5(b):

Mountain Crane Service LLC 393 S Monterey St Salt Lake City, UT 84104

Douglas C. Bernstein Plunkett Cooney, P.C. Counsel for Bank of Ann Arbor 38505 Woodward Ave., Suite 100 Bloomfield Hills, MI 48304

/s/ Steven C. Strong

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# **EXHIBIT** A

#### Mountain Crane Services, LLC

#### **Cash Collateral Forecast**

Equipment: Bare Rental58Fuel21Materials & Supplies17Tools2Rigging5Transport63Equipment Repairs and Maintenance22Parts9Tirres4Pilot Car Services7Tool Rental1Other2Rent9Advertising7Credit Card Processing Fees9Dues & Subscriptions1Health Care9Insurance1Licenses & Permits9Pravel & Entertainment1Penalties & Fines2Postage & Delivery7Printing2Travels & Maintenance - Yard1Taxes2Celephone9Utilities15Safety & Compliance3Bank & Finance Charges1Discount Fees1Bad Debt Write Off3Miscellaneous3Debtor's Counsel4	18         1           473         \$           0000	reek Ending: 1/26/2018 730,347 750,000 750,000 210,250 363 11,745	2/2/2018	2/28/2018	3/31/2018	Month Ending:           4/30/2017           \$ 931,909           4,750,000           4,750,000	Total
istimated Cash Receipts800otal Estimated Cash Receipts800istimated Cash Disbursements:210Labor217Travel210Subcontractor12Equipment: Bare Rental58Fuel21Materials & Supplies17Tools2Rigging55Transport63Equipment Repairs and Maintenance22Parts9Tires4Pilot Car Services7Tool Rental1Other2Rent9Advertising1Credit Card Processing Fees1Dues & Subscriptions1Health Care1Insurance1Internet1Licenses & Permits9Travel & Entertainment1Penalties & Fines2Postage & Delivery9Printing7Repairs & Maintenance - Yard1Taxes2Telephone9Utilities15Safety & Compliance3Bank & Finance Charges1Discount Fees1Bad Debt Write Off3Miscellaneous3Debtor's Counsel4Accountant to the Debtor4	0000 500 375 150 125 525 525	750,000 750,000 210,250 363	800,000	2,850,000	3,750,000	4,750,000	
Collections800stimated Cash Receipts800stimated Cash Disbursements:217Labor217Travel12Equipment: Bare Rental58Fuel21Materials & Supplies17Tools2Rigging5Transport63Equipment Repairs and Maintenance22Parts9Tires4Pilot Car Services7Toolk Car Services1Other2Rent2Rent2Insurance1Internet1Licenses & Permits9Travel & Entertainment1Penalties & Fines9Postage & Delivery9Printing1Repairs & Maintenance - Yard1Taxes2Subscriptions1Health Care15Insurance15Internet15Utilities15Training1Truck Expense1Office Supplies1Uniform Expense1Office Supplies1Inack Finance Charges1Discount Fees1Bank & Finance Charges1Bank & Finance Charges1Discount Fees1Bad Det Write Off3Accountant to the Debtor3	500 375 150 125 525 525	750,000 210,250 363	800,000				13,700,000
otal Estimated Cash Receipts800stimated Cash Disbursements:217Labor217Travel2Subcontractor12Equipment: Bare Rental58Fuel21Materials & Supplies17Tools2Rigging5Transport63Equipment Repairs and Maintenance22Parts9Tires4Pilot Car Services7Toolk Rental1Other2Rent9Advertising1Credit Card Processing Fees1Insurance1Insurance1Insurance1Internet1Licenses & Permits9Travel & Entertainment1Penaties & Fines9Postage & Delivery9Printing2Repairs & Maintenance - Yard1Taxes2Safety & Compliance3Bank & Finance Charges1Uniform Expense1Discount Fees1Bad Det Write Off3Miscellaneous3Dettor's Counsel4Accountant to the Debtor4	500 375 150 125 525 525	750,000 210,250 363	800,000				13,700,000
stimated Cash Disbursements:	500 375 150 125 525 525	210,250 363		2,850,000	3,750,000	4,750,000	
Labor217Travel12Subcontractor12Equipment: Bare Rental58Fuel21Materials & Supplies17Tools2Rigging5Transport63Equipment Repairs and Maintenance22Parts9Tires4Pilot Car Services7Toolk Rent9Advertising7Credit Card Processing Fees1Dues & Subscriptions1Health Care1Insurance1Internet1Licenses & Permits9Travel & Entertainment1Penalties & Fines2Postage & Delivery9Printing1Repairs & Maintenance - Yard1Taxes2Geliphone9Utilities15Training1Truck Expense1Office Supplies1Uniform Expense1Dyroll Expenses OH115Safety & Compliance3Bank & Finance Charges1Discount Fees1Bad Det Write Off3Miscellaneous3Dettor's Counsel4Accountant to the Debtor1	375 150 125 525 525	363	232,000				13,700,000
TravelSubcontractor12Equipment: Bare Rental58Fuel21Materials & Supplies17Tools2Rigging5Transport63Equipment Repairs and Maintenance22Parts4Pilot Car Services7Tool Rental1Other2Rent9Advertising7Credit Card Processing Fees7Dues & Subscriptions1Health Care1Insurance1Internet1Licenses & Permits9Travel & Entertainment1Penalties & Fines9Postage & Delivery9Printing1Travels & Maintenance - Yard1Taxes2Safety & Compliance3Bank & Finance Charges1Uniform Expense1Safety & Compliance3Bank & Finance Charges1Discount Fees1Bad Det Write Off1Miscellaneous3Dettor's Counsel4Accountant to the Debtor1	375 150 125 525 525	363	232,000				
Subcontractor12Equipment: Bare Rental58Fuel21Materials & Supplies17Tools22Rigging55Transport63Equipment Repairs and Maintenance22Parts9Vilot Car Services7Tool Rental1Other2Rent9Advertising7Credit Card Processing Fees7Dues & Subscriptions1Health Care9Internet1Licenses & Permits9Pravel & Entertainment1Penalties & Fines9Vutilities15Training1Truck Expense1Uniform Expense1Office Supplies1Uniform Expense1Diarden & Sinance3Bank & Finance Charges1Discount Fees1Discount Fees1Bad Debt Write Off3Accountant to the Debtor3	150 125 525 525			870,000	1,160,000	1,522,500	4,212,250
Equipment: Bare Rental58Fuel21Materials & Supplies17Tools2Rigging5Transport63Equipment Repairs and Maintenance22Parts9Tires4Pilot Car Services7Tools Rental1Other2Rent9Advertising7Credit Card Processing Fees9Dues & Subscriptions1Health Care9Insurance9Internet1Licenses & Permits9Pravel & Entertainment9Pravel & Entertainment1Penalties & Fines2Postage & Delivery7Printing2Repairs & Maintenance - Yard1Taxes2Celephone9Utilities15Safety & Compliance3Bank & Finance Charges1Discount Fees1Bad Debt Write Off3Miscellaneous3Dettor's Counsel4Accountant to the Debtor1	125 525 525	11,745	400	1,500	2,000	2,625	7,263
Fuel21Materials & Supplies17Tools2Rigging5Transport63Equipment Repairs and Maintenance22Parts9Tires4Pilot Car Services7Tool Rental1Other2Rent9Advertising7Credit Card Processing Fees9Dues & Subscriptions1Health Care1Insurance1Internet1Licenses & Permits9Postage & Delivery9Printing2Repairs & Maintenance - Yard1Taxels2Celephone9Utilities15Training1Truck Expense1Uniform Expense1Safety & Compliance3Bank & Finance Charges1Discount Fees1Bad Det Write Off3Miscellaneous3Dettor's Counsel4Accountant to the Debtor1	525 525		12,960	48,600	64,800	85,050	235,305
Materials & Supplies17Tools2Rigging5Transport63Equipment Repairs and Maintenance22Parts9Tires4Pilot Car Services7Tool Rental1Other2Advertising7Credit Card Processing Fees9Dues & Subscriptions1Health Care1Licenses & Permits9Travel & Entertainment1Penalties & Fines9Postage & Delivery9Printing1Tavels & Maintenance - Yard1Taxes2Ceffe Supplies1Uniform Expense1Uniform Expense1Office Supplies1Uniform Expense1Safety & Compliance3Bank & Finance Charges1Discount Fees1Bad Debt Write Off3Accountant to the Debtor9	525	56,188	62,000	232,500	310,000	406,875	1,125,688
Tools2Rigging5Transport63Equipment Repairs and Maintenance22Parts9Tirres4Pilot Car Services1Tool Rental1Other2Rent2Advertising1Credit Card Processing Fees1Dues & Subscriptions1Health Care1Insurance1Insurance1Printing9Travel & Entertainment1Postage & Delivery9Printing1Repairs & Maintenance - Yard1Taxes2Cifice Supplies1Uniform Expense1Office Supplies1Uniform Expense3Bank & Finance Charges1Discount Fees1Bad Debt Write Off3Back Debt Yrie Consel3Accountant to the Debtor1		20,808	22,960	86,100	114,800	150,675	416,868
Rigging5Transport63Equipment Repairs and Maintenance22Parts9Tires4Pilot Car Services1Tool Rental1Other2Rent9Advertising7Credit Card Processing Fees1Dues & Subscriptions1Health Care1Insurance1Licenses & Permits9Postage & Delivery9Printing1Repairs & Maintenance - Yard1Taxels2Zlelephone9Utilities15Training1Truck Expense1Difform Expenses OH15Safety & Compliance3Bank & Finance Charges1Discount Fees1Bad Debt Write Off3Dettor's Counsel4Accountant to the Debtor4		17,038	18,800	70,500	94,000	123,375	341,338
Transport63Equipment Repairs and Maintenance22Parts9Tirres4Pilot Car Services7Tool Rental1Other2Rent9Advertising7Credit Card Processing Fees0Dues & Subscriptions1Health Care1Internet1Licenses & Permits9Travel & Entertainment1Penalties & Fines9Postage & Delivery9Printing1Taxes2Telephone9Utilities15Training1Truck Expense1Difform Expenses OH115Safety & Compliance3Bank & Finance Charges1Discount Fees1Bad Det Write Off3Miscellaneous3Dettor's Counsel4Accountant to the Debtor1	025	1,958	2,160	8,100	10,800	14,175	39,218
Equipment Repairs and Maintenance22Parts9Tirres4Pilot Car Services7Tool Rental1Other2Rent9Advertising7Credit Card Processing Fees9Dues & Subscriptions1Health Care1Insurance1Internet1Licenses & Permits9Pravel & Entertainment9Postage & Delivery7Printing2Repairs & Maintenance - Yard1Taxes2Telephone9Utilities15Training15Safety & Compliance3Bank & Finance Charges1Discount Fees1Bad Debt Write Off3BoetDor's Counsel3Accountant to the Debtor2	175	5,003	5,520	20,700	27,600	36,225	100,223
Parts9Tires4Pilot Car Services1Tool Rental1Other2Rent9Advertising2Credit Card Processing Fees2Dues & Subscriptions1Health Care1Insurance1Internet1Licenses & Permits9Travel & Entertainment1Penalties & Fines9Postage & Delivery7Printing2Repairs & Maintenance - Yard1Taxes2Telephone9Utilities15Training1Truck Expense1Uniform Expense1Dyroll Expenses OH115Safety & Compliance3Bank & Finance Charges1Discount Fees1Bad Det Write Off3Miscellaneous3Dettor's Counsel4Accountant to the Debtor1	750	61,625	68,000	255,000	340,000	446,250	1,234,625
Tires4Pilot Car Services1Tool Rental1Other2Rent9Advertising1Credit Card Processing Fees1Dues & Subscriptions1Health Care1Insurance1Internet1Licenses & Permits9Travel & Entertainment1Penalties & Fines9Postage & Delivery9Printing1Taxes2Telephone9Utilities15Training1Truck Expense1Office Supplies1Uniform Expense OH115Safety & Compliance3Bank & Finance Charges1Discount Fees1Bad Det Write Off3Accountant to the Debtor1	275	21,533	23,760	89,100	118,800	155,925	431,393
Pilot Car ServicesTool Rental1Other2Rent9Advertising7Credit Card Processing Fees1Dues & Subscriptions1Health Care1Insurance1Internet1Licenses & Permits9Travel & Entertainment1Penalties & Fines9Postage & Delivery9Printing1Repairs & Maintenance - Yard1Taxes2Zelephone9Utilities15Training1Truck Expense1Office Supplies1Uniform Expenses OH115Safety & Compliance3Bad Debt Write Off15Miscellaneous3Dettor's Counsel2Accountant to the Debtor15	575	9,353	10,320	38,700	51,600	67,725	187,373
Tool Rental1Other2Rent9Advertising2Credit Card Processing Fees2Dues & Subscriptions1Health Care1Internet1Licenses & Permits9Pravel & Entertainment1Pravel & Entertainment1Pravel & Delivery9Printing2Repairs & Maintenance - Yard1Taxes2Zelephone9Utilities15Training1Truck Expense1Office Supplies1Uniform Expenses OH115Safety & Compliance3Bank & Finance Charges1Discount Fees1Bad Det Write Off3Miscellaneous3Dettor's Counsel4Accountant to the Debtor1	300	4,640	5,120	19,200	25,600	33,600	92,960
Other2Rent9Advertising9Advertising Fees9Dues & Subscriptions1Health Care1Insurance1Internet1Licenses & Permits9Yravel & Entertainment1Penalties & Fines2Postage & Delivery7Printing2Repairs & Maintenance - Yard1Taxes2Telephone9Utilities15Training1Truck Expense1Office Supplies1Uniform Expense1Safety & Compliance3Bank & Finance Charges1Discount Fees1Bad Debt Write Off3Miscellaneous3Dettor's Counsel4Accountant to the Debtor1	375	363	400	1,500	2,000	2,625	7,263
Rent9AdvertisingCredit Card Processing FeesDues & Subscriptions1Health CareInsuranceInsurance1Licenses & Permits9Travel & Entertainment1Penalties & FinesPostage & DeliveryPrinting2Repairs & Maintenance - Yard1Taxes2Telephone9Utilities15Training1Truck Expense1Uniform Expense1Dyroll Expenses OH115Safety & Compliance3Bank & Finance Charges1Discount Fees1Bad Detb Write Off3Accountant to the Debtor1	800	1,740	1,920	7,200	9,600	12,600	34,860
Advertising Credit Card Processing Fees Dues & Subscriptions Health Care Insurance Internet Internet Iticenses & Permits Postage & Delivery Printing Repairs & Maintenance - Yard Itaxes Itelephone Potoge & Delivery Printing Truck Expense Cffice Supplies Itilities Itice Supplies Itines Safety & Compliance Safety & Compliance Safety & Compliance Safety & Compliance Compliance Safety & Compliance Safety & Compliance Safety & Compliance Compliance Safety & Compliance	925	2,828	3,120	11,700	15,600	20,475	56,648
Credit Card Processing Fees Dues & Subscriptions Health Care Insurance Internet Inte	000	5,000		14,000	14,000	14,000	56,000
Dues & Subscriptions1Health CareInsuranceInsurance1Licenses & Permits9Travel & Entertainment1Penalties & FinesPostage & DeliveryPrinting1Repairs & Maintenance - Yard1Taxes2Telephone9Utilities15Training1Truck Expense1Office Supplies1Uniform Expense1Safety & Compliance3Bank & Finance Charges1Discount Fees1Bad Debt Write Off3Debtor's CounselAccountant to the Debtor	-	1,000	-	1,000	1,000	1,000	4,000
Health Care Insurance Internet 1 Licenses & Permits 9 Pravel & Entertainment 1 Penalties & Fines Postage & Delivery Printing Repairs & Maintenance - Yard 1 Taxes 2 Elephone 9 Utilities 15 Training 7 Truck Expense 9 Office Supplies 1 Uniform Expense 1 Diffice Supplies 1 Uniform Expense 0 Miser and the set of	750	725	800	3,000	4,000	5,250	14,525
Insurance Internet In	125	1,088	1,200	4,500	6,000	7,875	21,788
Internet 1 Licenses & Permits 9 Travel & Entertainment 1 Penalties & Fines 9 Postage & Delivery 9 Printing 7 Repairs & Maintenance - Yard 1 Taxes 2 Telephone 9 Utilities 15 Training 7 Truck Expense 9 Office Supplies 1 Uniform Expense 1 Payroll Expenses OH 115 Safety & Compliance 3 Bank & Finance Charges 1 Discount Fees 1 Bad Debt Write Off 1 Miscellaneous 3 Debtor's Counsel 4 Accountant to the Debtor	-	-	-	37,000	37,000	37,000	111,000
Licenses & Permits 9 Travel & Entertainment 1 Penalties & Fines Postage & Delivery Printing Repairs & Maintenance - Yard 1 Taxes 2 Telephone 9 Utilities 15 Training 7 Truck Expense 1 Uniform Expense 1 Payroll Expenses OH 115 Safety & Compliance 3 Bank & Finance Charges 1 Discount Fees 1 Bad Debt Write Off Miscellaneous 3 Debtor's Counsel Accountant to the Debtor	-	-	-	100,000	100,000	100,000	300,000
Travel & Entertainment     1       Penalties & Fines     Postage & Delivery       Printing     Repairs & Maintenance - Yard       Repairs & Maintenance - Yard     1       Taxes     2       Telephone     9       Utilities     15       Training     Truck Expense       Office Supplies     1       Uniform Expense     1       Payroll Expenses OH     115       Safety & Compliance     3       Bank & Finance Charges     1       Discount Fees     1       Bad Debt Write Off     3       Diebtor's Counsel     3       Accountant to the Debtor     3	000	-	-	1,000	1,000	1,000	4,000
Penalties & Fines         Postage & Delivery         Printing         Repairs & Maintenance - Yard         1         Taxes         2         Telephone         9         Utilities         15         Training         Truck Expense         Office Supplies         1         Payroll Expenses OH         115         Safety & Compliance         3         Bank & Finance Charges         1         Bad Debt Write Off         Miscellaneous         3         Debtor's Counsel         Accountant to the Debtor	375	9,063	10,000	37,500	50,000	65,625	181,563
Postage & Delivery Printing Repairs & Maintenance - Yard 1 Taxes 2 Telephone 9 Utilities 15 Training Truck Expense Office Supplies 1 Uniform Expenses 1 Uniform Expenses 1 Payroll Expenses OH 115 Safety & Compliance 3 Bank & Finance Charges 1 Discount Fees 1 Bad Debt Write Off Miscellaneous 2 Debtor's Counsel Accountant to the Debtor	875	1,813	2,000	7,500	10,000	13,125	36,313
Printing Repairs & Maintenance - Yard 1, Taxes 2 Telephone 9 Utilities 15, Training 15, Training 10, Truck Expense 9 Office Supplies 1 Uniform Expense 1 Payroll Expenses OH 115 Safety & Compliance 3 Bank & Finance Charges 1, Discount Fees 1, Bad Debt Write Off Miscellaneous 3 Debtor's Counsel Accountant to the Debtor	563	544	600	2,250	3,000	3,938	10,894
Repairs & Maintenance - Yard1Taxes2Telephone9Utilities15Training7Truck Expense1Office Supplies1Uniform Expense1Payroll Expenses OH115Safety & Compliance3Bank & Finance Charges1Discount Fees1Bad Debt Write Off3Miscellaneous3Debtor's Counsel4Accountant to the Debtor3	525	508	560	2,100	2,800	3,675	10,168
Taxes 2 Telephone 9 Utilities 15 Training 7 Truck Expense 1 Office Supplies 1 Vinform Expense 1 Payroll Expenses OH 115 Safety & Compliance 3 Bank & Finance Charges 1 Discount Fees 1 Bad Debt Write Off Miscellaneous 3 Debtor's Counsel 4 Accountant to the Debtor	188	181	200	750	1,000	1,313	3,631
Telephone9Utilities15Training15Truck Expense1Office Supplies1Uniform Expenses1Payroll Expenses OH115Safety & Compliance3Bank & Finance Charges1Discount Fees1Bad Debt Write Off3Miscellaneous3Debtor's Counsel4Accountant to the Debtor3	575	1,523	1,680	6,300	8,400	11,025	30,503
Utilities15Training15Truck Expense0Office Supplies1Uniform Expense1Payroll Expenses OH115Safety & Compliance3Bank & Finance Charges1Discount Fees1Bad Debt Write Off3Miscellaneous3Debtor's Counsel3Accountant to the Debtor3	250	2,175	2,400	9,000	12,000	15,750	43,575
Training Truck Expense Office Supplies 1 Uniform Expense 1 Uniform Expense 1 Payroll Expenses OH 115 Safety & Compliance 3 Bank & Finance Charges 1 Discount Fees 1 Bad Debt Write Off Miscellaneous Debtor's Counsel Accountant to the Debtor	000	-	-	9,000	9,000	9,000	36,000
Truck Expense         Office Supplies       1         Uniform Expense       1         Payroll Expenses OH       115         Safety & Compliance       3         Bank & Finance Charges       1         Discount Fees       1         Bad Debt Write Off       3         Miscellaneous       3         Debtor's Counsel       4		-	-	15,000	15,000	15,000	60,000
Office Supplies     1       Uniform Expense     1       Payroll Expenses OH     115       Safety & Compliance     3       Bank & Finance Charges     1       Discount Fees     1       Bad Debt Write Off     3       Miscellaneous     3       Debtor's Counsel     4	253	244	269	1,011	1,347	1,768	4,893
Uniform Expense       1         Payroll Expenses OH       115         Safety & Compliance       3         Bank & Finance Charges       1         Discount Fees       1         Bad Debt Write Off       3         Miscellaneous       3         Debtor's Counsel       4         Accountant to the Debtor       3	-	25,000	-	35,000	35,000	35,000	130,000
Payroll Expenses OH     115       Safety & Compliance     3       Bank & Finance Charges     1       Discount Fees     1       Bad Debt Write Off     3       Miscellaneous     3       Debtor's Counsel     4       Accountant to the Debtor     3	219	1,179	1,300	4,877	6,502	8,534	23,612
Safety & Compliance     3       Bank & Finance Charges     1       Discount Fees     1       Bad Debt Write Off     3       Debtor's Counsel     3       Accountant to the Debtor     3	575	1,523	1,680	6,300	8,400	11,025	30,503
Bank & Finance Charges     1       Discount Fees     1       Bad Debt Write Off     3       Discollaneous     3       Debtor's Counsel       Accountant to the Debtor	975	115,000 3,843	110,000	410,000	410,000	410,000 27,825	1,570,000 76,983
Discount Fees 1 Bad Debt Write Off Miscellaneous 3 Debtor's Counsel Accountant to the Debtor	975 050	3,843 1,015	4,240 1,120	15,900 4,200	21,200 5,600	7,350	20,335
Bad Debt Write Off Miscellaneous 3 Debtor's Counsel Accountant to the Debtor	425	1,015	1,120	4,200	7,600	9,975	20,555 27,598
Miscellaneous 3 Debtor's Counsel Accountant to the Debtor	+25 375	363	400	1,500	2,000	2,625	7,263
Debtor's Counsel Accountant to the Debtor			400			2,625	
Accountant to the Debtor	750	3,625	25,000	15,000 25,000	20,000 25,000	25,000	72,625 100,000
	-		20,000	10,000	7,500	7,500	45,000
Creditors Committee			15,000	15,000	15,000	15,000	43,000 60,000
	-	- 131,250	45,456	234,203	515,567	515,567	1,469,221
otal Estimated Cash Disbursements 648	- - 78	733,465	718,866	2,793,990	3,702,117	4,488,695	13,085,258
Net Cash Flow 151	- - 178 125	16,535	81,134		47,883	261,305	614,742
Net Cash Flow 151,	125	10,535	61,134	56,010	47,883	201,305	014,742

#### Footnotes:

[A] Calculated as a percentage of estimated Crane Service Revenue, percentages are calculated using last 5 years of financial information.

[B] Fixed costs based on historical financial data and adjusted for Mountain Crane's cost reduction efforts.

[C] Based on a reduced full time employee count.

[E] Based on reduced full time employee count. Estimate includes payroll taxes for OH employees.

[F] Provided by outside accounting advisory team.

[G] Provided by outside legal advisory team.

[H] Calculated as interest payments on notes being serviced. [I] Based on historical collection averages, through February.

[J] Payments in March and April are based on projected debt service payments (principle and interest) going forward.

<sup>[</sup>D] Reduced cash requirement due to prepayment of umbrella insurance premiums.