

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION
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IN RE:

SUNCOAST ARCADE, INC.,
Debtors.

CASE NO. 8:19-bk-8674-MGW
Chapter 11

EMERGENCY HEARING REQUESTED

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DEBTOR'S EMERGENCY MOTION TO AUTHORIZE USE OF CASH COLLATERAL

The Debtor, SUNCOAST ARCADE, INC., by its undersigned counsel, pursuant to Section 363 of the Bankruptcy Code, hereby moves for authority to use cash collateral, and states:

1. On September 13, 2019, the Debtor filed a voluntary chapter 11 petition with this Court. The Debtor manufactures and sells arcade games and pinball machines.

2. The Debtor does not have receivables and had very limited cash at the petition date. The Debtor sells its merchandise on a cash basis via the internet through Amazon and other methods. The Debtor has limited inventory with an aggregate value of less than \$25,000. In recent weeks, the Debtor has survived on loans from David Weaver, the brother of the Debtor's president.

3. The Debtor does not know at this time if there are any valid liens against its property but notes the following UCC filings in the Florida Secured Transactions Registry: (a) FFE Services, LLC, as representative, filed March 5, 2018; (b) CHTD Company filed July 25, 2018 (on behalf of Swift Financial); (c) Square Capital, LLC, filed on January 18, 2019; (d) First Corporate Solutions, as representative, filed on April 10, 2019; (e) Financial Agent Services filed on July 29, 2019; and (f) LG Funding LLC filed on August 7, 2019. The Debtor is attempting to obtain the information on the underlying secured creditors where the UCCs are filed in a representative capacity. This Motion is being served on the e-mails provided in the UCC filings.

4. In any event, even if any of the above-referenced UCC filings are valid and support an allowable secured claim in this case, the Debtor must be able to use cash collateral to continue with its business. Given the absence of cash and receivables and the value of inventory, it is likely that only the first position secured creditor will have an allowable secured claim.

5. The interests of the holders of the above-referenced UCC filings, to the extent valid at all, will be adequately protected by the continued operation of the Debtor's business. A budget is attached hereto as **Exhibit A**.

WHEREFORE, the Debtor requests authority to use cash collateral, and for such further relief as the Court deems appropriate.

JOHNSON, POPE, BOKOR,
RUPPEL & BURNS, LLP

/s/ Michael C. Markham
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished electronically to: karla.stefanson@gmail.com for FFE Services, LLC; SPRFiling@cscglobal.com for CHTD Company; CLS-CTLS_Glendale_Customer_Service@wolterskluwer.com for Square Capital, LLC; SPRS@FICOSO.com for First Corporate Solutions; SPRFiling@cscglobal.com for Financial Agent Services; sosack@uccdirect.com for LG Funding LLC; Sergio I. Scuteri at sscuteri@capehart.com as counsel for Swift Financial, and all CM/ECF participants this 17th day of September, 2019.

/s/ Michael C. Markham

Small Business Cash Flow Projection

Company Name

Starting date
 Cash balance alert minimum

	Beginning	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Total
Cash on hand (beginning of month)	0	0	0	0	0	0	0	0	-10,885	-20,920	-29,880	-29,765	-26,468	
CASH RECEIPTS														
Arcade sales		16,000							17,000	17,000	21,000	25,000	28,000	124,000
Returns and allowances														
Collections on accounts receivable		75							75	75	100	100	100	529
Interest, other income														
Loan proceeds														
Pinball Sales														
TOTAL CASH RECEIPTS		16,075							17,075	17,075	21,100	25,100	28,100	124,529
Total cash available	0	0	0	0	0	0	0	15,925	6,040	-3,995	-8,980	-4,865	1,432	
CASH PAID OUT														
Advertising		550							550	550	550	550	550	3,300
Commissions and fees														
Contract labor														
Employee benefit programs														
Insurance (other than health)														
Interest expense														
Materials and supplies (in COGS)														
Meals and entertainment														
Mortgage interest														
Office expense														
Credit Card Processing														
Pension and profit-sharing plan														
Purchases for resale														
Rent or lease														
Rent or lease: vehicles, equipment														
Repairs and maintenance														
Supplies (not in COGS)														
Taxes and licenses														
Travel														
Utilities														
Wages (less emp. credits)														
Shipping														
Legal														
Tools														
Miscellaneous														
SUBTOTAL		0	0	0	0	0	0	26,810	26,960	25,885	20,785	21,603	23,063	145,106
CASH PAID OUT														
Loan principal payment														
Capital purchases														
Other startup costs														
To reserve and/or escrow														
Owners' withdrawal														
TOTAL CASH PAID OUT		0	0	0	0	0	0	26,810	26,960	25,885	20,785	21,603	23,063	145,106
Cash on hand (end of month)	0	0	0	0	0	0	-10,885	-20,920	-29,880	-29,765	-26,468	-21,631		
OTHER OPERATING DATA														
Sales volume (dollars)														0
Accounts receivable balance														0
Bad debt balance														0
Inventory on hand														0
Accounts payable balance														0
Depreciation														0