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IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:

Case No.: 17-40218-BTR-11

UNIQUE MOTORSPORTS, INC.
46-1658175
500 E. State Highway 121 Bus.
Lewisville, TX 75057

Chapter: 11

Debtor.

UNIQUE MOTORSPORTS, INC.'S, EMERGENCY MOTION FOR ORDER AUTHORIZING
THE INTERIM AND FINAL USE OF CASH COLLATERAL

TO THE HONORABLE BRENDA T. RHOADES, CHIEF UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Unique Motorsports, Inc., Debtor and Debtor in possession in the above-styled and numbered cases (the "Debtor"), and files this *Unique Motorsports, Inc.'s, Emergency Motion for Order Authorizing the Interim and Final Use of Cash Collateral* by and through the undersigned attorney. Debtor requests the entry of an interim order substantially in the form attached hereto as Exhibit "A" (the "Interim Order") and a final order (the "Final Order", and in conjunction with the Interim Order, the "Cash Collateral Orders"), pursuant to 11 U.S.C. §§ 105, 361, and 363 and Federal Rules of Bankruptcy Procedure 4001 and 9014: (a) authorizing Debtor to use the cash collateral of the Secured Lender (defined *infra*) and granting adequate protection thereto; and (b) prescribing the form and manner of notice and setting the time for the final hearing on this Motion (the "Final Hearing"). The facts and circumstances supporting this Motion are set forth in the Affidavit of Dustin Helms (the "Helms Affidavit"), filed concurrently herewith. In support thereof Debtor respectfully shows the Court as follows:

JURISDICTION

1. The Court has jurisdiction over the subject matter of this Motion pursuant to 28 U.S.C. §1334(b) and the standing order of reference of the District Court. This matter is a core proceeding. 28 U.S.C. §§ 157(b)(1), (b)(2)(M).

2. Venue in this Court is proper under 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are sections 105, 361 and 363 of title 11 of United States Code, 11 U.S.C. §§ 101-1532 (the "**Bankruptcy Code**"), and rules 2002, 4001 and 9014 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**").

BACKGROUND

Procedural History

4. This case was commenced by the filing of a voluntary petition under Chapter 11 of the United States Bankruptcy Code on February 3, 2017 (the "**Petition Date**").

5. No trustee or examiner has been appointed, and no official committee of creditors has yet been established.

Business History and Operations

6. Debtor is a Texas corporation.

7. Debtor is a Powerstroke diesel performance and repair facility located in Lewisville, Texas. Debtor also provides a wide range of other vehicle services, including window tinting, audio video installation, and routine maintenance.

8. Debtor is also a licensed car dealership with a small inventory of trucks and cars.

Litigation

9. The primary reason for filing this bankruptcy case stems from litigation between the Debtor and Neal Technologies, Inc., styled as *Neal Technologies, Inc., v. Unique Motorsports Inc., et al*, and filed in the United States District court, Eastern District of Texas, Sherman Division, case number 4:15-cv-00385-RC-CMC (the "**Lawsuit**"). Simply stated, the Lawsuit was an unfair competition and trademark infringement case.

10. The District Court entered a judgment in the Lawsuit on January 20, 2017 [Docket Entry No. 184] (the "**Judgment**"). The Judgment awarded damages to Neal Technologies, Inc, in the sum of \$253,000 plus costs.

Secured Lenders

11. In accord with Bankruptcy Rule 4001(b)(1)(B)(i) and (iii), Debtor's secured creditors¹ that filed a UCC-1 financing statement in order to perfect a security interest in personal property, are as follows:

LENDER	COLLATERAL
<p>NextGear Capital 11799 North College Ave. Camel, IN 46032</p> <p>Original Loan Date: March, 2012 Maturity Date: n/a Est. Balance: \$13,307.45 Obligor(s): Unique Motorsports, Inc. Guarantor(s): Dustin Helms UCC-1 Filed: March 9, 2012</p>	<p>All Debtor assets and properties wherever located, including without limitation all equipment of any kind or nature, all vehicles, vehicle parts and inventory now owned or hereafter acquired, without limitation, purchase money inventory, the purchase of which was financed or floorplanned by Dealer Services Corporation for Debtor of whatever kind or nature, and all returns, repossessions, exchanges, substitutions, attachments, additions, accessions, accessories, replacements, and proceeds thereof; all accounts, accounts receivable, chattel paper, and general intangibles now owned or thereafter acquired by Debtor together with the proceeds thereof; all of Debtor's documents, books and records relating to the forgoing..</p>
<p>CarBucks 417 Woods Lake Rd. Greenville, SC 29607</p> <p>Original Loan Date: March 16, 2016</p>	<p>All of the following assets, property and interests in property of the Debtor, whether such Collateral shall be presently owned or existing or at any time hereafter acquired, arising or created by Debtor, wherever located, together with all products and proceeds of such Collateral, and any replacements, additions, accessions or substitutions therefore, and proceeds of insurance covering such</p>

¹ Premised upon the UCC-1 filings and other related security documents reviewed to date of the Debtor.

Maturity Date:	c/a	Collateral: (a) All inventory, including but not limited to cars, trucks and other motor vehicles titled by state agencies; (b) All accounts, including contract rights, accounts receivable and other right to payment for services rendered; (c) All chattel paper, including but not limited to installment sales, contracts and electronic paper; (d) All instruments, including but not limited to notes, bills of exchange, stocks and bonds; (e) All general intangibles, including but not limited to all insurance proceeds, all insurance claims and chooses in action; (f) All proceeds, including but not limited to cash, checks, deposit accounts, money and items received in exchange for collateral.
Est. Balance:	\$52,717.00	
Original Balance:	n/a	
Obligor(s):	Unique Motorsports, inc.	
Guarantor(s):	Dustin Helms	
UCC-1 Filed:	August 11, 2014	

12. As evidenced above, it is likely the Debtor has two (2) lenders (collectively, the “**Secured Lenders**”) asserting a security interest in its assets.

13. Nextgear Capital appears to be secured by a first priority lien on and security interest in substantially all of Debtor’s personal property.

14. Carbucks appears to be secured by a second priority lien on and security interest in substantially all of Debtor’s personal property.

15. As described in the Helms Declaration, in the normal course of business, Debtor uses cash on hand and cash flow from operations to fund working capital, capital expenditures, fuel, materials, supplies, and other general corporate purposes. An inability to use these funds during the chapter 11 cases would cripple Debtor’s business operations. Indeed, Debtor must use its cash to, among other things, continue the operation of the business in an orderly manner, maintain business relationships with vendors, suppliers and customers, pay employees and satisfy other working capital and operation needs—all of which are necessary to preserve and maintain Debtor’s going-concern value and, ultimately, effectuate a successful reorganization.

RELIEF REQUESTED

16. By this Motion and pursuant to 11 U.S.C. §§ 105, 361 and 363 of the Bankruptcy Code and Bankruptcy Rules 4001 and 9014, Debtor requests that the Court grant the following relief:

a. Authorize Debtor, **on an interim basis**, pursuant to section 363(c) of the Bankruptcy Code, to use proceeds of assets on which Secured Lenders assert a lien and security interest (the "**Cash Collateral**")² in accord with the budget attached hereto as Exhibit "B" (the "**Budget**");

b. Authorize Debtor, **on an interim basis**, pursuant to sections 361 and 363 of the Bankruptcy Code, to provide the adequate protection described herein to the Secured Lenders as regards any diminution in value of the Secured Lenders' interest in the Collateral as existing on the Petition Date ("**Prepetition Collateral**"), whether from the use of Cash Collateral or the use, sale, lease, depreciation, or decline in value of said collateral;

c. Schedule the Final Hearing pursuant to Bankruptcy Rule 4001 no later than fourteen (14) days after the entry of the Interim Order, to consider the entry of a Final Order authorizing the use of Cash Collateral and approving the notice procedures relative thereto;

d. Authorize Debtor, **on a final basis**, pursuant to 363(c) of the Bankruptcy Code, to use the Cash Collateral in accord with the Budget and any supplemental budgets as approved by the Court after further notice and hearing; and

² Debtor does not hereby admit or consent to the validity, priority, extent or enforceability of the liens asserted by Secured Lenders and hereby reserves all rights with respect thereto.

e. Authorize Debtor, **on a final basis**, pursuant to sections 361 and 363 of the Bankruptcy Code to provide the adequate protection described herein to the Secured Lenders as regards any diminution in value of the Secured Lenders' interest in the Prepetition Collateral, whether from the use of Cash Collateral or the use, sale, lease, depreciation, or decline in value of said collateral.

BASIS FOR RELIEF

Immediate Need for Use of Cash Collateral

17. Pursuant to Bankruptcy Rule 4001(b)(2), the Court may conduct a preliminary cash collateral hearing within fourteen (14) days of the Petition Date if the relief requested is **necessary to avoid immediate and irreparable harm** to the estate pending a final hearing.

18. Debtor has an immediate need for the use of Cash Collateral pending a final hearing on this Motion. As of the Petition Date, Debtor lacks sufficient unencumbered cash to fund its business operation.

19. Without the use of Cash Collateral, Debtor will have no ability to operate the business. Debtor will not be able to pay its vendors and its vendors will likely cease to provide goods and services to Debtor on credit. Debtor will not be able to fund its payroll. Debtor will not be able to pay professionals necessary for the successful reorganization of its business. Finally, Debtor will not be able to service the needs of its customers. All of these outcomes will cause immediate and irreparable harm to Debtor's bankruptcy estate.

20. Debtor's ability to finance its operations and the availability to Debtor of sufficient working capital and liquidity through the use of Cash Collateral is vital to the confidence of its employees, suppliers, and customers and to the preservation and maintenance of the going-concern value and other values of the bankruptcy estate. Debtor,

therefore, seeks immediate authority to use the Cash Collateral as set forth in the Motion and in the Interim Cash Collateral Order to prevent immediate and irreparable harm to its bankruptcy estate pending the Final Hearing pursuant to Bankruptcy Rule 4001(c).

21. Debtor has formulated a Budget for the use of Cash Collateral from the Petition Date through two weeks (14 days) thereafter. Debtor believes the Budget includes all reasonable, necessary and foreseeable expenses to be incurred in the ordinary course of business during the subject time period **so as to avoid immediate and irreparable harm** to the bankruptcy estate pending a final hearing.

22. Accordingly, Debtor seeks to use Cash Collateral existing on or after the Petition Date that may be subject to Secured Lenders' interest in the Prepetition Collateral. As of the Petition Date, Debtor lacks sufficient unencumbered cash to fund the business operation.

23. If approved by this Court Debtor's right to use Cash Collateral under the terms of the Interim Order will commence on the date of the entry of the Interim Order and expire on the earlier of: (a) the entry of a subsequent interim order; or (b) the entry of the Final Order.

Adequate Protection

24. In consideration for the interim use of cash collateral, and as adequate protection for any diminution of the interest of the Secured Lenders in the Prepetition Collateral, Debtor hereby tenders to the Secured Lenders, to the extent the Secured Lenders may hold valid, perfected and unavoidable security interests in the Prepetition Collateral without any requirement to file any documents to perfect that interest, additional and replacement security interests and liens (the "**Replacement Liens**") as follows:

The granting of postpetition security interests equivalent to a lien granted under sections 364(c)(2) and (3) of the Bankruptcy Code, as applicable, in and upon the Debtor's personal property

and the Cash Collateral, whether such property was acquired before or after the Petition Date.

25. In addition to the Replacement Liens, the Secured Lenders are adequately protected as a result of the continued business operations. But for the continued operation of Debtor, it will be forced to liquidate its assets.

Request for Final Hearing

26. Pursuant to Bankruptcy Rule 4001(b)(2), Debtor requests this Court set a date for the Final Hearing that is as soon as practicable, but in no event later than fourteen (14) days following the entry of the Interim Order, and fix the time and date prior to the Final hearing for parties to file objections to this Motion.

BANKRUPTCY RULE 4001(B)

27. Debtor submits the facts set forth in the Loper Affidavit filed contemporaneously herewith establish that “the relief requested herein is necessary to avoid immediate and irreparable harm” to Debtor. Bankruptcy Rule 4001(b)(2). Accordingly, Bankruptcy Rule 4001 is satisfied.

NOTICE

28. Bankruptcy Rules 4001 and 9014 generally require that any proceeding to use cash collateral be made only upon Motion and on notice to: (1) any entity that has an interest in the Cash Collateral; (2) a Committee that may be appointed under the Bankruptcy Code (11 U.S.C. § 1102) or, if no such committee is appointed, on the twenty largest unsecured creditors; and (3) such other entities as the Court may direct.

29. Notice of this Motion has been given via email and/or facsimile transmission to: (1) the Office of the United States Trustee for the Northern District of Texas; and (2) the

Secured Lenders. Each of the Debtor's unsecured creditors and any additional parties identified on the attached Mailing Matrix were served via US Mail.

WHEREFORE, Debtor respectfully requests this Court enter an Interim Order on an emergency basis granting the relief requested herein, establishing a date and time for the Final Hearing, and providing for such other and further relief to which Debtor may be justly entitled.

Respectfully submitted,

Dated: February 6, 2017

/s/ Robert T. DeMarco

DeMarco•Mitchell, PLLC

Robert T. DeMarco, Texas Bar No. 24014543

Email robert@demarcomitchell.com

Michael S. Mitchell, Texas Bar No. 00788065

Email mike@demarcomitchell.com

1255 W. 15th Street, 805

Plano, TX 75075

T 972-578-1400

F 972-346-6791

Proposed Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that true and correct copies of the foregoing pleading and all attachments were served upon all parties listed below in accordance with applicable rules of bankruptcy procedure on this 6th day of February, 2017. Where possible, service was made electronically via the Court's ECF noticing system or via facsimile transmission where a facsimile number is set forth below. Where such electronic service was not possible, service was made via regular first class mail.

DEBTOR

Unique Motorsports, Inc.
500 E. State Highway 121 Bus.
Lewisville, TX 75057

UNITED STATES TRUSTEE

Office of the United States Trustee
110 N. College Avenue, Suite 300

Tyler, TX 75702

Email: USTPRegion06.TY.ECF@usdoj.gov

ADDITIONAL PARTIES IN INTEREST AND/OR PARTIES REQUESTING NOTICE

NextGear Capital

11799 North College Ave.

Camel, IN 46032

Email: tammy.noe@nextgearcapital.com

CarBucks

417 Woods Lake Rd.

Greenville, SC 29607

Fax: (864) 234-9506

SEE ATTACHED MATRIX

/s/ Robert T. DeMarco

DeMarco•Mitchell, PLLC

Robert T. DeMarco, Texas Bar No. 24014543

Email robert@demarcomitchell.com

Michael S. Mitchell, Texas Bar No. 00788065

Email mike@demarcomitchell.com

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IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:

UNIQUE MOTORSPORTS, INC.
46-1658175
500 E. State Highway 121 Bus.
Lewisville, TX 75057

Debtor.

Case No.: 17-40218-BTR-11

Chapter: 11

ORDER AUTHORIZING INTERIM USE OF CASH COLLATERAL

On this day came on for consideration the *Debtor's Emergency Motion for Order Authorizing the Interim and Final Use of Cash Collateral* (the "**Motion**"). The Motion is made pursuant to 11 U.S.C. §§ 105, 361 and 363 and Federal Rules of Bankruptcy Procedure 4001 and 9014: (a) authorizing the Unique Motorsports, Inc., to use cash collateral of existing secured lenders and granting adequate protection to existing secured lenders for the use of their cash collateral; and (b) prescribing the form and manner of notice and setting the time for the final hearing (the "**Final Hearing**") on the Motion. Upon review of the Motion, the Affidavit of Dustin Helms and based upon the evidence presented to this Court at the interim hearing on the Motion (the "**Interim Hearing**"), the Court hereby makes the following findings of fact and conclusions of law:

1. Adequate and sufficient notice of the Motion and the Interim Hearing has been provided to all persons entitled thereto pursuant to Rules 2002 and 4001 of the Federal Rules of Bankruptcy Procedure.
2. This matter constitutes a "core proceeding" within the meaning of 28 U.S.C. § 157.

EXHIBIT "A"

3. This Court has jurisdiction over the parties and the subject matter of this proceeding pursuant to 28 U.S.C. §§ 1334 and 157.

4. Unique Motorsports, Inc., Debtor and Debtor in possession in the above-styled and numbered case ("Debtor") commenced the case *sub judice* on February 3, 2017 (the "Petition Date") by the filing of a petition for relief under chapter 11 of the Bankruptcy Code.

5. Secured Lenders (defined in the Motion) assert that they are secured in substantially all Debtor's personal property (collectively, the "Prepetition Collateral") and the proceeds thereof (the "Cash Collateral").

ACCORDINGLY, IT IS ORDERED THAT:

1. The Debtor is permitted to use Cash Collateral, in accord with the Budget attached hereto as Exhibit "A" (the "Budget"), provided, the Debtor may exceed any line item in the Budget by up to ten percent (10%). The Budget may be updated and modified through the date of the Final Hearing by: (a) consensual agreement of Debtor and the Secured Lenders; or (b) by further order of this Court.

2. Debtor's right to use Cash Collateral under the Interim Order shall commence on the date of entry of the Interim Order and expire on the earlier of: (a) the entry of a subsequent interim cash collateral order; or (b) the entry of a Final Order.

3. As adequate protection of the Secured Lender's interest, if any, in the Cash Collateral pursuant to sections 361 and 363(e) of the Bankruptcy Code to the extent of any diminution in value from the use of the Collateral the Court hereby grants the Secured Lenders replacement security liens on and replacement liens on all of Debtor's personal property (the "Replacement Liens"), whether such property was acquired before or after the Petition Date.

4. Such Replacement Liens are exclusive of any avoidance actions available to the Debtor's bankruptcy estate pursuant to sections 544, 545, 547, 548, 549, 550, 553(b) and 724(a) of the Bankruptcy Code and the proceeds thereof.

5. Further, such Replacement Liens shall be equal to the aggregate diminution in value of the Collateral, if any, that occurs from and after the Petition Date. The Replacement Liens shall be of the same validity and priority as the liens of the Secured Lenders on the prepetition Collateral.

6. The Replacement Liens granted herein shall maintain the same priority, validity and enforceability as the Secured Lenders' liens on the prepetition Collateral. The Secured Lenders shall not be required to file or serve financing statements, notices of liens or similar interests which otherwise may be required under federal or state law in any jurisdiction, or take any action, including taking possession, to validate and perfect such Replacement Liens.

7. The Replacements Liens shall be subject and subordinate to: (a) professional fees and expenses of the attorneys, financial advisors and other professionals retained by the Debtor in the amounts set forth in the Budget and any supplemental budget approved by the Court and/or consented to by the Secured Lenders and subject to this Court's approval under section 330 and/or section 331 of the Bankruptcy Code; and (b) any and all fees payable to the United States Trustee pursuant to 28 U.S.C. § 1930(a)(6) and the Clerk of the Bankruptcy Court (collectively, the "Carve Out").

8. This Interim Order is without prejudice to the rights of the Secured Lenders or the Debtor as to any further order regarding the use of Cash Collateral as to the request for payment of any other expenses incurred during the period covered by this Interim Order.

9. This Interim Order is without prejudice to the rights of any party-in-interest, including the Debtor, to contest the priority, validity and enforceability of the Secured Lenders' liens and security interests in and to the prepetition Collateral.

10. During the term of this Interim Order, Debtor shall comply with all terms and conditions of the loan documents executed by the Debtor and the Secured Lenders, including but not limited to the reporting requirements set forth therein, except to the extent modified herein.

11. The Final Hearing to consider the entry of a Final Order authorizing and approving the use of Cash Collateral is hereby scheduled for _____, 2017, at ____:____.m.

12. This Interim Order is and shall be fully effective upon its entry.

ORDER SUBMITTED BY:

/s/ Robert T. DeMarco

DeMarco•Mitchell, PLLC

Robert T. DeMarco, Texas Bar No. 24014543

Email robert@demarcomitchell.com

Michael S. Mitchell, Texas Bar No. 00788065

Email mike@demarcomitchell.com

1255 W. 15th Street, 805

Plano, TX 75075

T 972-578-1400

F 972-346-6791

**Proposed Counsel for Debtors and
Debtors in Possession**

EXHIBIT "A"

UNIQUE MOTORSPORTS, INC.

	WEEKS 1 & 2	FEBRUARY
	2/3 THRU 2/17	2/3 THRU 2/28
Income		
Total	\$ 60,000.00	\$ 115,000.00
Expenses		
Advertising	\$ 500.00	\$ 1,000.00
Parts for Repairs	\$ 6,000.00	\$ 12,000.00
Insurance / Utilities	\$ 5,000.00	
Rent / Shop Supplies		\$ 7,500.00
Vehicle Purchases	\$ 25,000.00	\$ 50,000.00
Fuel	\$ 600.00	\$ 1,200.00
Bodywork / Paint	\$ 4,000.00	\$ 8,000.00
Staff Lunches	\$ 500.00	\$ 1,000.00
Office Supplies		\$ 250.00
Vehicle Registration Fees	\$ 2,500.00	\$ 4,000.00
Payroll	\$ 11,500.00	\$ 23,000.00
Total	\$ 55,600.00	\$ 107,950.00
 Profit	 \$ 4,400.00	 \$ 7,050.00

UNIQUE MOTORSPORTS, INC.

	WEEKS 1 & 2	FEBRUARY
	2/3 THRU 2/17	2/3 THRU 2/28
Income		
Total	\$ 60,000.00	\$ 115,000.00
Expenses		
Advertising	\$ 500.00	\$ 1,000.00
Parts for Repairs	\$ 6,000.00	\$ 12,000.00
Insurance / Utilities	\$ 5,000.00	
Rent / Shop Supplies		\$ 7,500.00
Vehicle Purchases	\$ 25,000.00	\$ 50,000.00
Fuel	\$ 600.00	\$ 1,200.00
Bodywork / Paint	\$ 4,000.00	\$ 8,000.00
Staff Lunches	\$ 500.00	\$ 1,000.00
Office Supplies		\$ 250.00
Vehicle Registration Fees	\$ 2,500.00	\$ 4,000.00
Payroll	\$ 11,500.00	\$ 23,000.00
Total	\$ 55,600.00	\$ 107,950.00
Profit	\$ 4,400.00	\$ 7,050.00

EXHIBIT "B"

Label Matrix for local noticing
0540-4
Case 17-40218
Eastern District of Texas
Sherman
Mon Feb 6 13:48:05 CST 2017

Unique Motorsports Inc
500 E. State Highway 121 Business
Lewisville, TX 75057-4788

Plano - U. S. Bankruptcy Court
Suite 300B
660 North Central Expressway
Plano, TX 75074-6795

Attorney General of Texas
Bankruptcy Reporting Contact
OAG/CSD/Mail Code 38
P.O. Box 12017
Austin, TX 78711-2017

Attorney General of Texas
Taxation Division - Bankruptcy
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Austin, TX 78711-2548

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Texarkana, TX 75503-2730

CarBucks Floor Plan
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Greenville, SC 29607-2777

Falcon Document Solutions
301 Commerce Street
Suite 240
Ft. Worth, TX 76102-4142

G.W. Roberts Law Firm, PLLC
5001 Spring Valley Road
Suite 400 East
Dallas, TX 75244-3947

Internal Revenue Service -
Centralized Insolvency Operations
PO Box 7346
Philadelphia, PA 19101-7346

John & Paul Bosco
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Lewisville, TX 75067-0867

LP Litigation Paralegals, LLC
325 N. St. Paul St.
Suite 3100
Dallas, TX 75201-3923

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McKinney, TX 75071-4507

Marcus White
C/O James L. Rogers Jr.
1413 Harroun Ave.
McKinney, TX 75069-3430

NTTA
Customer Service Center
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Plano, TX 75026-0928

Nathan Hall
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Mesquite, TX 75181-1553

Neal Technologies
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Mesa, AZ 85215-1142

Neal Technologies, Inc.
c/o Richard L. Schwartz
301 Commerce St.
City Center Tower II, Ste. 3500
Fort Worth, TX 76102-4140

NextGear Capital
11799 North College Ave.
Camel, IN 46032-5605

SAFE
Protegga LLC
730 E. Park Blvd., Ste. 210
Plano, TX 75074-8850

SEC
100 F Street, NE
Washington, DC 20549-2001

Texas Comptroller of Public Accounts
Office of the Attorney General
Bankruptcy Collections Div.
P.O. Box 12548, MC-008
Austin, TX 78711-2548

US Trustee
Office of the U.S. Trustee
110 N. College Ave.
Suite 300
Tyler, TX 75702-7231

United States Attorney
110 North College Ave., Ste. 700
Tyler, TX 75702-0204

United States Trustee
110 North College Ave., Ste. 300
Tyler, TX 75702-7231

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Plano, TX 75075-7225

End of Label Matrix
Mailable recipients 25
Bypassed recipients 0
Total 25