

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
(Central Division)

)	
In Re:)	
)	Chapter 11
UNIVERSAL SOFTWARE CORPORATION.)	Case No. 16-40872-CJP
)	
Debtor.)	
)	

MOTION BY DEBTOR FOR APPROVAL OF SECOND FURTHER STIPULATED ORDER AUTHORIZING FURTHER USE OF CASH COLLATERAL

Universal Software Corporation, the herein Chapter 11 debtor-in-possession (the “Debtor” or “Universal Software”), hereby moves the Court for an Order, pursuant to 11 U.S.C. §§363, and MLBR 4001-2, approving the Second Further Stipulated Order (the “Second Further Stipulated Order”) Authorizing Further Use of Cash Collateral, and Providing Adequate Protection entered into with the Debtor’s secured lender, TD Bank, N.A. (“TD Bank”) and filed contemporaneously herewith, and scheduling a continued hearing on the continued further use of cash collateral on a permanent basis.

In support of this Motion, the Debtor states as follows:

Jurisdiction and Venue

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. §157(b)(2).
2. Venue is proper pursuant to 28 U.S.C §§ 1408 and 1409.

Background

3. On May 18, 2016 (the “Petition Date”), the Debtor filed voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code (the “Bankruptcy Code”).
4. Pursuant to Sections 1107 and 1108 of the Bankruptcy Code, the Debtor

continues to operate its own affairs and conduct its business as a debtor-in-possession under the Bankruptcy Code.

5. On June 7, 2016, the Court entered an Order authorizing the Debtor to use cash collateral on interim basis through June 30, 2016.

6. On June 30, 2016, the Court entered an Order authorizing the Debtor to further use cash collateral on a final basis through September 30, 2016.

7. On September 28, 2016, the Court entered an Order authorizing the Debtor to further use cash collateral on a final basis through December 30, 2016.

8. The Debtor and TD Bank have agreed to the further use of cash collateral through March 31, 2017, all as more fully set forth in the proposed Second Stipulated Order for Further Use of Cash Collateral and proposed Budget attached hereto and filed along herewith.

WHEREFORE, the Debtor respectfully requests that the Court enter an Order approving the Second Stipulated Order for Further Use of Cash Collateral and proposed Budget attached hereto and filed along herewith, and for such further relief as the Court may deem just and appropriate.

UNIVERSAL SOFTWARE CORPORATION
By its attorneys,

/s/ George J. Nader

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Dated: December 9, 2016

CERTIFICATE OF SERVICE

I, George J. Nader, do hereby certify that I have this day served a copy of **MOTION BY DEBTOR FOR APPROVAL OF SECOND FURTHER STIPULATED ORDER AUTHORIZING FURTHER USE OF CASH COLLATERAL**, by electronic mailing on those registered to receive electronic notice otherwise by first class mail, postage prepaid to the individuals on the attached Service List.

UNIVERSAL SOFTWARE CORPORATION
By its attorneys,

/s/ George J. Nader

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Dated: December 9, 2016

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