

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ALABAMA, NORTHERN DIVISION

IN RE:)
)
KENTISH TRANSPORTATION, INC.,) CASE NO. 17-80242-CRJ11
)
Debtor.) CHAPTER 11

DEBTOR'S MOTION TO LEASE VEHICLE

COMES NOW, Kentish Transportation, Inc. ("Debtor"), as Debtor and Debtor-in-Possession, by and through its undersigned counsel, pursuant to Section 363(b) of Title 11 of the United States Code and Rule 6004 of the *Federal Rules of Bankruptcy Procedure*, and moves this Court to allow Debtor to enter into a lease agreement with Enterprise Commercial Trucks ("Lessor") and, as grounds therefore, states as follows:

1. Debtor wishes to enter into a lease agreement with Lessor regarding the acquisition of an Express Courier, 26-foot box truck, at the base rate of \$1,450.00, per month. A true and correct copy of the Lessor's Vehicle Illustration is attached hereto as Exhibit A.
2. Debtor's this Lease will provide further business opportunities to increase revenue to fund the Chapter 11 Plan.

WHEREFORE, the Debtor respectfully requests this Court to enter an order allowing the assumption of this Lease and to grant such other and further relief as this Court deems just and proper.

/s/ Stuart M. Maples

STUART M. MAPLES

MAPLES LAW FIRM, PC
200 Clinton Avenue West, Suite 1000
Huntsville, Alabama 35801
(256) 489-9779 – Telephone
(256) 489-9720 – Facsimile
smaples@mapleslawfirm.com

CERTIFICATE OF SERVICE

I do hereby certify that on March 1, 2017, a copy of the foregoing document was served on the following:

Richard Blythe
Bankruptcy Administrator
P.O. Box 3045
Decatur, AL 35602
Via email: richard_blythe@alnb.uscourts.gov

by Electronic Case Filing a copy of the same.

I do hereby certify that on March 1, 2017, a copy of the foregoing document was served on the following:

All parties requesting notice
All creditors listed on the matrix attached hereto

by mailing a copy of the same United States Mail, properly addressed and first class postage prepaid.

/s/ Stuart M. Maples

STUART M. MAPLES

EXHIBIT A



ID SCHD-140808-092907
Prepared on: 2/23/2017
Source: CRM

Vehicle Illustration

Prepared for: KTI Express Courier
Vehicle Type: 26 ft Box Truck
Base Rates: \$1450.00 per month
\$352.50 per week
.10 cents per mile

- Rate is based on a projection of 2,500 miles driven per month. If actual mileage exceeds projected monthly mileage by 20% or more, terms may be adjusted.
- Rate includes scheduled maintenance and repairs.
- Rate adjustment: 5.0% annual increase
- Rate does not include taxes and other fees.
- Rate does not include optional damage waiver with N/A retained responsibility.
- Rate does not include optional liability protection with N/A.

Term:

One month term with automatic one month renewals through the benchmark.

Benchmark:

6 months

Termination:

Either party can terminate upon 30 days written notice.

Early Termination:

If customer terminates prior to the benchmark 5% of the monthly remaining payments to reach the benchmark will be owed by customer.

Example: if vehicle is returned 3 months prior to benchmark, will be due.

(per month x 3 months x 5%) plus unamortized special equipment, if applicable.

Payment Terms:

Net 30 and can be billed on a weekly, bi-weekly or monthly basis.

Security deposit:

\$0 due at commencement.

Special Equipment: Enterprise will pay \$0.00 for customer requested special equipment and amortize it over the benchmark. If vehicle is returned prior to the benchmark, customer shall pay Enterprise the unamortized amount of the equipment based on the number of months remaining until the benchmark.

Vehicle Illustration is for example purposes only. Please reference the Master Truck Rental Agreement, Schedule(s) and Rental Contract for details.

Label Matrix for local noticing
1126-8
Case 17-80242-CRJ11
NORTHERN DISTRICT OF ALABAMA
Decatur
Wed Mar 1 12:02:06 CST 2017

Wells Fargo Equipment Finance, Inc.
Baker Donelson, PC
c/o Eric L. Pruitt
420 20th Street North
Suite 1400
Birmingham, AL 35203-3221

**Aramark
2680 Pulumbo Dr
Lexington, KY 40509-1234

**Cosco
PO Box 6704
Sioux Falls, SD 57117-6704

(p)FORD MOTOR CREDIT COMPANY
P O BOX 62180
COLORADO SPRINGS CO 80962-2180

**Penske Truck Leasing Co.
PO Box 827380
Philadelphia, PA 19182-7380

**Sam's Club/GEMB
PO Box 981400
El Paso, TX 79998-1400

**de lange landen
1111 Old Eagle School Rd
Wayne, PA 19087-1453

Convergent Commercial, Inc.
925 Westchester Ave Ste 101
West Harrison, NY 10604-3562

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Ford Motor Credit Company LLC
c/o S Dagnal Rowe
Wilmer & Lee PA
PO Box 2168
Huntsville, AL 35804-2168

U. S. Bankruptcy Court
400 Well Street
P. O. Box 2775
Decatur, AL 35602-2775

**Bancorp South
PO Box 3356
Tupelo, MS 38803-3356

**Firestone
535 Marriott Dr
Nashville, TN 37214-5019

**Lanier, Ford
PO Box 2087
Huntsville, AL 35804-2087

**Progress Bank & Trust
8337 Hwy 72
Madison, AL 35758-9548

**TQL
PO Box 634558
Cincinnati, OH 45263-4558

Ally Bank
PO Box 130424
Roseville MN 55113-0004

Interconnect Systems Corporation
2950 Drake Ave
Huntsville, AL 35805-5124

Jackie Richards
4835 Sparkman Dr.
Huntsville, AL 35810-3948

Kentish Transportation, Inc.
4839 Sparkman Dr.
Huntsville, AL 35810-3948

**Ally
PO Box 380903
Bloomington, MN 55438-0903

**Capitol One
PO Box 60599
City of Industry, CA 91716-0599

**FleetMatics USA LLC
1100 Winter St.
Waltham, MA 02451-1427

**Mike Crabtree
1290 Kennestone Circle, Ste A-215
Marietta, GA 30066-6009

**SBA/Bancorp South
PO Box 3356
Tupelo, MS 38803-3356

**Wells Fargo Equipment Finance, Inc.
MAC N9300-100
600 South 4th St
Minneapolis, MN 55415-1526

Cecilio Kentish, Jr.
105 Villa Dr
Meridianville, AL 35759-2454

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

Joyce White Vance
US Attorney General
1801 4th Ave North
Birmingham, AL 35203-2101

Loretta Lynch US Attorney General
US Dept. of Justice
950 Pennsylvania Ave NW
Washington, DC 20530-0009

Luther Strange
Alabama Attorney General
PO Box 300152
Montgomery, AL 36130-0152

Lynda Hall, Tax Collector of Madison CO, AL
100 Northside Square, Room 116
Huntsville, AL 35801-8815

Reid Webster
139 Deaton Road
Lacey Springs, Alabama 35754-3503

Secretary of the Treasury
1500 Pennsylvania Ave., NW
Washington, DC 20220-0001

Southern Property Holdings, Inc.
809 Mastin Lake Rd.
Huntsville, AL 35811-1232

State of Alabama
Department of Revenue Legal Division
PO Box 320001
Montgomery, AL 36132-0001

U.S. Securities and Exchange Commission
Regional Director, Branch of Reorganizat
Atlanta Regional Office, Suite 900
950 East Paces Ferry Road
Atlanta, GA 30326-1180

United States Attorney
Northern District of Alabama
1801 Fourth Avenue North
Birmingham, AL 35203-2101

United States Bankruptcy Administrator
Northern District of Alabama
1800 Fifth Avenue North
Birmingham, AL 35203-2111

West Ferry Properties
c/o Battle Real Estate
228 Holmes Ave, Ste 1000
Huntsville, AL 35801-8805

Richard M Blythe
United States Bankruptcy Administrator
PO Box 3045
Decatur, AL 35602-3045

Stuart M Maples
Maples Law Firm, PC
200 Clinton Avenue W.
Suite 1000
Huntsville, AL 35801-4919

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

**Ford Motor Credit
PO Box 62180
Colorado Springs, CO 80962

(d)Ford Motor Credit Company LLC
P. O. Box 62180
Colorado Springs, CO 80962

End of Label Matrix	
Mailable recipients	42
Bypassed recipients	0
Total	42