

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

IN RE: *
* Case No. 15-03885
BRANDON DORTCH FARMS, LLC, *
* Chapter 11
Debtor. *

**JOINT EMERGENCY MOTION TO APPROVE POST-PETITION
FINANCING FOR THE 2017 CROP**

1. This is the motion of the Debtor Brandon Dortch Farms, LLC and First National Bank and Trust (“FNB&T) under Bankruptcy Code §364(c)(2) and (d) to approve a post-petition financing agreement between the Debtor and FNB&T to fund the 2017 Crop year on an interim and final basis. This Court has jurisdiction under 28 U.S.C. §1334(b). This is a core proceeding under 28 U.S.C. §157(b).

2. The Debtor filed a voluntary petition under Chapter 11 of the Bankruptcy Code in this Court on November 25, 2015, and is a debtor-in-possession.

3. The Debtor is engaged in the farming business. The Debtor plants, grows and harvests several crops, including cotton, peanuts, corn, soybeans and certain “truck” crops on land owned by the Debtor and on rented land. In order to operate the farm, the Debtor must incur expenses for seed, fertilizer, chemicals, fuel, insurance, land rent, equipment maintenance and repairs, etc.

4. The Debtor has reached an agreement with FNB&T to finance the 2017 Crop year with a 1.1 million dollar revolving line of credit facility upon the terms set forth on Exhibit A hereto.

5. The Debtor is unable to obtain unsecured credit allowable under §503(b)(1) as an

administrative expense.

6. The projected 2017 operating budget for the Debtor is attached as Exhibit "B".

7. The financing agreement described in this motion will enable the Debtor to continue to operate its farm through the 2017 farming cycle.

8. The terms of the financing agreement are necessary and reasonable, and are essential in order for the Debtor to continue to operate.

WHEREFORE, The Debtor and FNB&T pray that upon the notice and hearing the Court will approve the financing statement with FNB&T described above on an interim and final basis, and for such other relief as is just.

/s/ Richard A. Wright

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CERTIFICATE OF SERVICE

I, Jason R. Watkins, certify that on the March 1, 2017, a true and correct copy of the above and foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Jason R. Watkins
Jason R. Watkins