

UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA

IN RE:
ALABAMA INJURY AND PAIN CLINIC

CASE NUMBER: 18-03685

Debtor

MOTION FOR AUTHORITY TO USE CASH COLLATERAL

Comes now your Movant, the Debtor-in-Possession, ALABAMA INJURY AND PAIN CLINIC, by and through its Attorney, Barry A. Friedman, and would show unto the Court as follows:

1. Your Movant is the Debtor-In-Possession in this matter having filed its Chapter 11 Petition on September 11, 2018.
2. Your Movant operates a chiropractic practice.
3. Your Movant provides medical services to persons who have suffered injuries.
4. Your Movant is referred potential patients from many local attorneys to assist in the treatment of these injuries and to help in rehabilitation of the injured.
5. Your Movant accepts the referrals with the expectation that when the injury case is resolved, the incurred treatments costs will be paid to him by the referring attorney from the settlement proceeds.
6. When the Debtor filed this Chapter 11, the IRS claims it is owed approximately \$349,905.93 which the Debtor disputes.
7. Prior to the filing of this Chapter 11, the IRS issued levies to the referring attorneys, which if allowed, will cripple the Debtors' ability to rehabilitate and reorganize itself.

8. The Debtor requests the Court to allow it to use the receipts from these referrals as well as private pays to operate and pay its day to day expenses.

9. Your Movant avers that unless the Court authorizes the use of cash collateral, it will be forced to close down its business forcing the firing of its employees and the elimination for the opportunity to pay its bill resulting in economic losses to others.

10. Your Movant further avers that unless the Court authorizes the use of cash collateral, the going value of its business enterprises will be lost and any possibility of reorganization will be eliminated.

WHEREFORE, Your Movant requests this Honorable Court to grant the relief it seeks and for such other, further and different relief as is just in the premises

\S\ BARRY A FRIEDMAN
BARRY A FRIEDMAN
Attorney for Movant
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CERTIFICATE OF SERVICE

I, Barry A. Friedman, do hereby certify that I have on this 18th day of September, 2018 served a copy of the foregoing pleading by depositing same in the United States mail, first class postage prepaid and/or electronically upon all parties in interest listed on the attached mailing matrix and on Kasee S. Heisterhagen, Attorney for PNC Bank, RSA Tower, 11 North Water Street, Suite 22200, Mobile, AL 36602.

\s\ BARRY A FRIEDMAN
BARRY A FRIEDMAN

