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18 **UNITED STATES BANKRUPTCY COURT**
19 **DISTRICT OF ARIZONA**

20 In re:
21 PRECISE CORPORATE STAGING,
22 LLC, ■
23 DEDICATED STAGING, LLC, ■
24 DAVMAR INVESTMENTS, LLC, ■
25 Debtors.
26 This filing applies to:
27 ■ All Debtors
28 □ Precise Corporate Staging, LLC

Chapter 11 Proceedings
Case No. 2:16-bk-14281-PS
Case No. 2:16-bk-14283-PS
Case No. 2:16-bk-14284-PS

(Jointly Administered)

**EMERGENCY MOTION FOR HEARING
AND AUTHORIZATION FOR USE OF
CASH COLLATERAL**

20 Precise Corporate Staging, LLC. (“**Precise Staging**”), Dedicated Staging, LLC
21 (“**Dedicated Staging**”), and DavMar Investments, LLC (“**DavMar**”), (collectively the
22 “**Debtors**”), by and through undersigned counsel, request a hearing on the Cash Collateral
23 Order [DE 147].

24 Numerous times over the past month undersigned counsel has attempted to engage
25 Western State Bank to request and negotiate an extension of cash collateral, but has been
26 unable to do so. Debtors’ Counsel has placed phone calls and sent emails, which have
27 mostly gone unanswered, and now believes have exhausted all means to initiate a
28

1 discussion regarding cash collateral other than filing this Emergency Motion.

2 Today, the Debtors used cash collateral to pay their electricity bill because they had
3 received notification that it would be shut off tomorrow. The Debtors did so because they
4 believe they had a fiduciary duty to safeguard the assets, as best they could, and without
5 air conditioning the equipment risked being harmed. They also need money to pay for the
6 alarm system and other necessities during the final months of these cases.
7

8
9 Therefore, and for the reasons stated in the *Debtors' Emergency Motion For*
10 *Interim Order Authorizing Use of Cash Collateral Granting Adequate Protection, And*
11 *Setting Further Hearings* [DE 17], the Debtors request a hearing and order authorizing the
12 use of cash collateral under 11 U.S.C. § 363.
13

14 RESPECTFULLY SUBMITTED July 24, 2017.

15 **GERALD K. SMITH AND JOHN C. SMITH**
16 **LAW OFFICES, PLLC**

17 By s/ John C. Smith

18 John C. Smith
19 Grant L. Cartwright
20 *Attorneys for Debtors*

21
22 COPY of the foregoing mailed or emailed*
23 on July 24, 2017, to:

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s/ Liza D. Taylor
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