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9 Attorney for Debtors

10 **IN THE UNITED STATES BANKRUPTCY COURT**
11 **FOR THE DISTRICT OF ARIZONA**

12 In re: Chapter 11 Proceedings
13 PARAMOUNT BUILDING SOLUTIONS,
14 LLC,
15 Debtor. Case No. 2:17-bk-10867-EPB

16 In re: Case No. 2:17-bk-10868-DPC
17 CLEANING SOLUTIONS, LLC,
18 Debtor.

19 In re: Case No. 2:17-bk-10869-BKM
20 JMS BUILDING SOLUTIONS, LLC,
21 Debtor.

22 In re: Case No. 2:17-bk-10870-EPB
23 (Jointly Administered)
24 STARLIGHT BUILDING SOLUTIONS, LLC,
25 Debtor **MOTION FOR ORDER APPROVING THE
26 USE OF CASH COLLATERAL
27 THROUGH NOVEMBER 30, 2017**

28 Debtors, through counsel undersigned, and pursuant to Rule 4001(b), Federal Rules of
Bankruptcy Procedure, hereby state as follows:

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157
and 1334, and 11 U.S.C. §§ 362 and 363.

2. Attached hereto as **Exhibit A** is the Cash Flow Forecast filed with the
Debtors' Motion to Obtain Debtor-in-Possession Financing filed on September 15, 2017.

1 3. Attached hereto as **Exhibit B** is an updated compilation, reflecting actual
2 results of operations through October 13, 2017.

3 4. On September 15, 2017, the Debtors filed an Emergency Motion for Interim
4 and Final Order Authorizing Debtors to Obtain Secured Post-Petition Financing on a
5 Super Priority Basis Pursuant to Sections 363, 364, and 507(b), and Other Relief. *See, DE*
6 *#9* (the “**DIP Motion**”). The DIP Motion is incorporated herein by this reference as if
7 fully set forth.

8 5. DW Jade, LLC is the DIP Lender.

9 6. The Debtor requests the Court enter an Order authorizing the Debtors to
10 continue the use of cash collateral which is the subject of the DIP Lender’s liens and
11 security interests.

12 7. The DIP Motion stated the Debtors had acknowledged and agreed the DIP
13 Lender has a perfected interest in the Debtors’ cash collateral pursuant to the pre-petition
14 loan documents to secure the pre-petition obligations. The DIP Motion further noted an
15 agreement between the parties on the Debtors’ use of cash collateral contingent upon the
16 relief sought in the DIP Motion. The Court granted the use of cash collateral which
17 provided, *inter alia*, it would automatically terminate upon the earliest of twenty-one (21)
18 days following entry of the Interim Order, unless extended by the DIP Lender in its sole
19 discretion; or the defined “termination date.” *See Interim Order (DE #30), 9:9-12.*

20 8. Without the continued use of cash collateral, the Debtors will be forced to
21 cease operations.

22 9. The Interim Order was entered on September 21, 2017.

23 10. Without the continued use of cash collateral, the Debtors will have no
24 alternative but to contemplate ceasing operations. Accordingly, the Debtors request the
25 Court enter an Order authorizing the continued use of cash collateral.

1 DATED this 23rd day of October, 2017.

2 MICHAEL W. CARMEL, LTD.

3 /s/Carmel, M.W. (007356)
4 Michael W. Carmel
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7 Proposed Attorney for Debtors

8 COPY of the foregoing emailed
9 this 23rd day of October, 2017 to:

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By Sharon D. Kirby