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7 Attorneys for Debtor and Debtor-In-Possession,
8 RADIOLOGY SUPPORT DEVICES, INC.

9 **UNITED STATES BANKRUPTCY COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

12) Case No. 2:17-bk-12054-ER
13)
14) Chapter 11
15)
16) **DEBTOR’S REPLY TO STATEMENT BY**
17) **WELLS FARGO BANK, N.A. IN**
18) **RESPONSE TO DEBTOR’S MOTION FOR**
19) **CONTINUED USE OF CASH**
20) **COLLATERAL THROUGH SEPTEMBER**
21) **30, 2017**
22)
23)
24) Date: June 21, 2017
25) Time: 10:00 a.m.
26) Place: Courtroom 1568
27) 255 E. Temple St.
28) Los Angeles, CA

13 In re
14 RADIOLOGY SUPPORT DEVICES,
15 INC.
16 Debtor and Debtor-in-Possession.

1 Radiology Support Devices, Inc., a California corporation and the debtor and debtor in
2 possession herein (“Debtor” or “RSD”), hereby submits the following reply to the *Statement By*
3 *Wells Fargo Bank, N.A. In Response To Debtor’s Motion For Continued Use Of Cash Collateral*
4 *Through September 30, 2017 (“Statement”).*

- 5
- 6 1. The Debtor agrees to grant Wells Fargo Bank, N.A. (“WFB”) a replacement lien in
7 the post-petition assets in the same extent, validity, and priority as WFB’s prepetition
8 liens and security interest.
 - 9 2. The Debtor does not oppose a deadline for the filing of a Disclosure Statement and
10 Plan, however, WFB must first provide the current amount and accounting of its
11 claim. Since May 23, 2017, Debtor’s counsel has requested an accounting of the
12 Wells Fargo Claim and to date has not received either an accounting or the current
13 amount of Wells Fargo’s claim. On June 8, 2017, WFB’s counsel indicated that it
14 will take some time to calculate the exact amount of WFB’s claim.
15

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17
18 Dated: June 16, 2017

WEINTRAUB & SELTH, APC

19
20 By: /s/ Elaine V. Nguyen
21 Daniel J. Weintraub
22 James R. Selth
23 Elaine V. Nguyen
24 Attorneys for Debtor and Debtor-In-
25 Possession,
26 RADIOLOGY SUPPORT DEVICES, INC.
27
28

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

11766 Wilshire Blvd., Ste. 1170, Los Angeles, CA 90025

A true and correct copy of the foregoing document entitled (*specify*): DEBTOR'S REPLY TO STATEMENT BY WELLS FARGO BANK, N.A. IN RESPONSE TO DEBTOR'S MOTION FOR CONTINUED USE OF CASH COLLATERAL THROUGH SEPTEMBER 30, 2017 will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **June 16, 2017**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Ronald K Brown** ron@rkbrownlaw.com
- **Elaine Nguyen** elaine@wsrlaw.net, melissa@wsrlaw.net;vinnet@ecf.inforuptcy.com;elayna@wsrlaw.net
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- **James R Selth** jim@wsrlaw.net, jselth@yahoo.com;melissa@wsrlaw.net;vinnet@ecf.inforuptcy.com
- **United States Trustee (LA)** ustpregion16.la.ecf@usdoj.gov
- **Daniel J Weintraub** dan@wsrlaw.net, melissa@wsrlaw.net;vinnet@ecf.inforuptcy.com
- **Hatty K Yip** hatty.yip@usdoj.gov

2. SERVED BY UNITED STATES MAIL:

On (*date*) **June 16, 2017**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **June 16, 2017**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Personal delivery to Chambers of Hon. Ernest M. Robles, United States Bankruptcy Court, Los Angeles Division

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

06/16/2017
Date

Elayna Fenelon
Printed Name

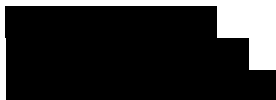
/s/ Elayna Fenelon
Signature

Well's Fargo Bank, N.A.
Hemar, Rousso & Heald, LLP
c/o J. Alexandra Rhim
15910 Ventura Blvd., 12th Floor
Encino, ca 91436-2829

Label Matrix for local noticing
0973-2
Case 2:17-bk-12054-ER
Central District of California
Los Angeles
Fri Jun 16 09:21:41 PDT 2017

RadioLoy Support Devices, Inc.
1904 E. Dominguez Street
Long Beach, CA 90810-1002

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Bankruptcy Section, MS: A-340
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Philadelphia, PA 19101-7346

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Los Angeles, CA 90051-1148

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LOS ANGELES CA 90054-0110

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980 Montecito Drive # 209
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United States Trustee (LA)
915 Wilshire Blvd, Suite 1850
Los Angeles, CA 90017-3560

WELLS FARGO BANK, N.A.
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PO Box 541065
Los Angeles, CA 90054-1065

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Minneapolis, MN 55408-2665

Wells Fargo Bank, N.A.
PO Box 8203
Boise, ID 83707-2203

Wilmington Associates
c/o Ronald K. Brown, Jr.
901 Dove St., Suite 120
Newport Beach, CA 92660-3018



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).

Citibank, N.A.
3950 Regent Blvd S2B-240
Irving, TX 75063

End of Label Matrix	
Mailable recipients	58
Bypassed recipients	0
Total	58