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CLERK U.S. BANKRUPTCY COURT
Central District of California
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Proposed Counsel for Debtor and Debtor-in-Possession,
Ameriquest Security Service

UNITED STATES BANKRUPTCY COURT

CHANGES MADE BY COURT

CENTRAL DISTRICT OF CALIFORNIA

LOS ANGELES DIVISION

In re

AMERIQUEST SECURITY SERVICE,

Debtor and Debtor-in-Possession.

CASE NO.: 2:18-bk-21241-WB

Chapter 11

**ORDER GRANTING DEBTOR'S
MOTION FOR AN ORDER
AUTHORIZING USE OF CASH
COLLATERAL ON A FINAL BASIS
PURSUANT TO 11 U.S.C. § 363**

Date: October ~~4~~**18**, 2018

Time: 10:00 a.m.

Ctrm: 1375

Place: 255 East Temple Street
Los Angeles, CA 90012

A hearing took place at the above time and place to consider Debtor, Ameriquest Security Service's ("Debtor") Motion for an Order Authorizing Use of Cash Collateral on Final Basis Pursuant to 11 U.S.C. § 363 (the "Cash Collateral Motion") [Docket No.: 16].
Appearances are noted on the record. After consideration of the Debtor's Cash Collateral Motion, arguments made at the hearing, the two Stipulations entered between the United States of America on behalf of the Internal Revenue Service and the Debtor for Adequate

1 Protection and Use of Cash Collateral [Docket Nos.: 9 and 26] and the revised budget in
2 support of the Cash Collateral Motion and good cause appearing;

3 IT IS HEREBY ORDERED:

4 1. The Debtor's Cash Collateral Motion is granted on final basis;

5 2. The Debtor is authorized to use the cash collateral of the United States
6 pursuant to Section 363(c)(2), for ordinary and necessary expenses in accordance with its
7 proposed budget attached as Exhibit 1 to the Declaration of Akram Gendy filed on
8 October 4, 2018 as Docket No.: 29;

9 3. The Debtor shall not use the IRS's cash collateral to make payment to
10 insiders, unless and until the Debtor has satisfied all requirements under the Code and
11 Local Bankruptcy Rule 2014-1(a) for payment to insiders;

12 4. Any funds set aside for payment of attorney's fees or accountant's fees
13 must be held in a segregated account. Payment of attorneys' fees and costs to the Law
14 Offices of Michael Jay Berger may only be paid where the Debtor obtains Court approval
15 of a fee application. Similarly, fees and costs to the accountants, Matthew Matta and
16 Jennifer Min Liu, may only be paid after the Debtor obtains Court approval. The United
17 States reserves its right to object to the fee applications and to payments of any fees;

18 5. Debtor may only use the IRS's cash collateral for payment of
19 prepetition wages where 11 U.S.C. § 507(a)(4) is satisfied;

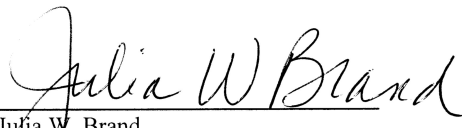
20 6. On October 15, 2018, the Debtor shall make an adequate protection
21 payment of \$7,000.00 to the IRS; and

22 7. As further adequate protection, the IRS and any other secured creditors
23 asserting an interest in the collateral of the Debtor shall receive a replacement lien, to the
24 same extent and priority, on all post-petition account receivables and all other property
25 acquired by Debtor to the full extent of the value of its prepetition lien(s).
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Date: November 2, 2018


Julia W. Brand
United States Bankruptcy Judge