

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF COLORADO

IN RE:	)	
	)	
TD MANUFACTURING, LLC	)	
EIN: 47-1730944	)	Case No. 17-14243-MER
	)	
Debtor.	)	

**MOTION FOR CONTINUED USE OF CASH COLLATERAL**

The Debtor and Debtor in Possession, TD Manufacturing, LLC (“Debtor”), by and through its attorneys, Buechler & Garber, LLC., for its Motion for Continued Use of Cash Collateral respectfully states as follows:

1. The Debtor filed for relief under Chapter 11 of the Bankruptcy Code on May 9, 2017 (the “Petition Date”). The Debtor remains a Debtor-in-Possession.

2. On May 15, 2017, the Debtor file its Motion for Authority to Use Cash Collateral (the “Cash Collateral Motion”), seeking to use cash collateral on an interim basis and requesting that the Court set a hearing to consider entry of a final order authorizing the use of cash collateral.

3. The Cash Collateral Motion was approved on an interim basis.

4. On June 13, 2017, the Debtor filed its Motion for Entry of Stipulated Order Authorizing Use of Cash Collateral and Vacating hearing on Final Use of Cash Collateral (the “Final Cash Collateral Motion”).

5. On June 14, 2017, the Court entered an Order approving the Final Cash Collateral Motion (the “Cash Collateral Order”).

6. The Cash Collateral Order authorized the use of cash collateral through December 31, 2017. The Cash Collateral Order further provided,

the Debtor is authorized to extend the cash collateral use period on a three month basis after December 31, 2017, on fourteen days notice with opportunity for a hearing provided to the Bank, the Trustee and any parties that may have a security interest in cash collateral. As part of the Debtor’s request for an extension, the Debtor shall provide to the Bank, the Trustee and any parties that may have a security interest in cash collateral by providing such parties with new budgets for additional monthly

periods. The Bank, the Trustee and any parties that may have a security interest in cash collateral shall be entitled to timely object to any extension requested by the Debtor.

7. On November 17, 2017, the Debtor filed its Motion for Continued Use of Cash Collateral. On December 28, 2017, the Court entered its Order approving the continued use of cash collateral through March 31, 2018. The Order further provides:

the Debtor is authorized to extend the cash collateral use period on a three month basis after March 31, 2018, on fourteen days notice with opportunity for a hearing provided to the Bank, the Trustee and any parties that may have a security interest in cash collateral. As part of the Debtor's request for an extension, the Debtor shall provide to the Bank, the Trustee and any parties that may have a security interest in cash collateral by providing such parties with new budgets for additional monthly periods. The Bank, the Trustee and any parties that may have a security interest in cash collateral shall be entitled to timely object to any extension requested by the Debtor.

8. The Debtor is seeking a three month extension of the use of cash collateral pursuant to the Budget attached hereto as Exhibit A on the same terms and conditions set forth in the Cash Collateral Order.

9. The Debtor has filed a proposed Plan of Reorganization. The Debtor Plan is currently being solicited, including the running voting and objection deadlines. The continued use of cash collateral is necessary as the Debtor proceeds through the Plan process.

WHEREFORE, the Debtor respectfully requests that the Court enter the proposed Order, a copy which is filed herewith, authorizing the Debtor's continued use of cash collateral and granting such further and additional relief as to the Court may appear proper.

DATED: February 27, 2018

Respectfully submitted,

By: /s/ Aaron A. Garber

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## EXHIBIT A

**TD Manufacturing  
Profit and Loss**

	month 1	month 2	month 3
<b>Total Income</b>	\$40,000.00	\$40,000.00	\$40,000.00
<b>Cost of Goods Sold</b>	\$5,000.00	\$5,001.00	\$5,002.00
<b>Gross Profit</b>	\$35,000.00	\$34,999.00	\$34,998.00
<b>Expenses</b>			
<b>Bankruptcy Asset payment</b>	\$1,000.00	\$1,000.00	\$1,000.00
<b>Insurance</b>	\$1,100.00	\$1,100.00	\$1,100.00
<b>Payroll Expenses</b>	\$24,000.00	\$24,000.00	\$24,000.00
<b>Rent or Lease</b>	\$4,000.00	\$4,000.00	\$4,000.00
<b>Repair &amp; Maintenance</b>	\$500.00	\$500.00	\$500.00
<b>Supplies</b>	\$50.00	\$50.00	\$50.00
<b>Taxes &amp; Licenses</b>	\$250.00	\$250.00	\$250.00
<b>Utilities</b>	\$3,350.00	\$3,350.00	\$3,350.00
<b>Vehicle</b>	\$500.00	\$500.00	\$500.00
<b>Total Expenses</b>	\$34,750.00	\$34,750.00	\$34,750.00
<b>Net Income</b>	\$250.00	\$249.00	\$248.00