

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION
www.flmb.uscourts.gov

In re:

CASE NO.: 6:17-bk-03856-KSJ

SQUARE ONE GAINESVILLE, LLC

CHAPTER 11

Debtor.

EMERGENCY RELIEF REQUESTED
ON OR BEFORE JUNE 14, 2017

**EMERGENCY MOTION FOR AUTHORITY TO USE CASH COLLATERAL
AND REQUEST FOR EMERGENCY PRELIMINARY HEARING**

SQUARE ONE DEVELOPMENT, LLC., (“Development”), and two (2) of its subsidiaries as listed on Exhibit “A” (the “Affiliates”), which includes the Debtor in the above captioned case, SQUARE ONE GAINESVILLE, LLC, (the “Affiliates” and “Development” are hereinafter collectively referred to as the “Debtors”), by and through their undersigned counsel, and pursuant to 11 U.S.C. §§ 363(c)(2) and 363(e), and the Federal Rules of Bankruptcy Procedure 4001(b), hereby move for authority to use cash collateral and to provide adequate protection to Stearns Bank (“Stearns Bank”), and to the extent necessary, to First Citrus Bank (“Citrus Bank”),¹ and in support of the relief sought, state as follows:

Jurisdiction

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. § 1334 and 11 U.S.C. § 363. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (M).

Background

2. On June 9, 2017 (the “Petition Date”), the Debtors filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code (“Bankruptcy Code”). The Debtors continue

¹ Debtors’ inclusion of the creditors to this Motion is in no way an admission that such creditors have a properly perfected security interest in the Debtor’s property. The Debtor specifically reserves its rights to contest the validity of such alleged security interest that may be asserted by Stearns Bank and Citrus Bank.

to operate their businesses and manage their properties as debtors-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

3. Development is a multi-member Florida limited liability company formed on April 6, 2010. Development owns a group of twelve (12) related entities including eight (8) gourmet burger restaurants with operations in West Central Florida. For a complete history and description of Debtors' operations, please refer to the Case Management Summary filed contemporaneously with this Motion.

4. As of the Petition Date, Affiliates owed approximately \$3,800,000.00 on a loan from Stearns Bank (the "Loan"). The Loan is secured by a blanket lien on the personal property of Affiliates.² By virtue of its purported lien, Stearns Bank may assert a first priority security interest in the Affiliates' cash on hand and funds to be received into their operating accounts during normal operations (the "Cash Collateral").

5. Citrus Bank may claim an inferior interest in the Cash Collateral by virtue of its purported lien. The Debtors believe Citrus Bank's inferior interest is wholly unsecured due to the outstanding balance owed to Stearns Bank.

The Cash Management System

6. Prior to the Petition Date, the Debtors, maintained a complex cash management system through which the Debtors collect and account for all monetary receipts and disbursements (the "Cash Management System").

7. The Cash Management System was developed to enable Debtors to accurately track: cash, checks and cash equivalents received by and transferred among Debtors.

² Such entities include: Square One Gainesville, LLC and Square One Lakeland.

8. The primary accounts for each of the Debtors are at Citrus Bank. Each day, funds are swept from the bank accounts maintained by the Affiliates to a master account in the name of Development (the “Master Account”). The Master Account serves as the concentrated collection point for all cash received by Debtors. Following the account sweep, Development retains a portion of the swept funds to cover insurance expenses for insurance provided under group insurance policies and other related administrative expenses, and also to cover payroll for each restaurant location manager (the “Related Expenses”). The balance remaining in the Master Account after deduction of the respective share of Related Expenses is then remitted to each of the Affiliates.

Cash Collateral and the Relief Sought by the Debtor

9. Debtors will require the use of approximately \$1,524,565.00 of Cash Collateral to continue to operate their businesses for the next six weeks, and, depending on the month, a greater or lesser amount will be required for each comparable period thereafter. Debtors will use the Cash Collateral to pay their respective share of Related Expenses and their respective operating expenses, pending a final hearing on this Motion (the “Interim Period”).

10. A consolidated budget reflecting the estimated income and expenses for Debtors over the next six weeks is attached hereto as **Exhibit A** and is incorporated herein by reference.

11. As adequate protection for the use of Cash Collateral, Affiliates propose to grant Stearns Bank a replacement lien to the extent of any diminution in value, with such lien to have the same validity, extent, and priority as its respective pre-petition lien. Affiliates will operate on a positive cash flow basis during the interim six-week period and assert all interests on Cash Collateral are adequately protected by the replacement lien.

12. If Debtors are not permitted to use Cash Collateral, they will be forced to halt operations, creating an adverse effect on creditors and employees, and will likely eliminate the total

value of assets pledged as collateral. Thus, Debtors believe that the protections outlined herein are fair and reasonable under the circumstances and will be sufficient to protect the interests of Stearns Bank's collateral from a diminution in value during the period of use by Debtors. Accordingly, under the circumstances of this Chapter 11 case, the granting of the relief requested in the Motion is warranted.

WHEREFORE, Debtors respectfully request the Court enter an order, in the form of the proposed order attached hereto as **Exhibit B**, granting the request for an emergency hearing, the request to use Cash Collateral on an interim period of six-weeks, and for such other and further relief as is just and proper.

RESPECTFULLY SUBMITTED this 12th day of June 2017.

/s/ R. Scott Shuker, Esq.
R. Scott Shuker, Esquire
Florida Bar No. 984469
rshuker@lseblaw.com
bknotice1@lseblaw.com
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Florida Bar No. 0098158
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Attorneys for the Debtors

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
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CASE NO.: 6:17-bk-03856-KSJ

SQUARE ONE GAINESVILLE, LLC

CHAPTER 11

Debtor.

_____ /

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of **EMERGENCY MOTION FOR AUTHORITY TO USE CASH COLLATERAL AND REQUEST FOR EMERGENCY PRELIMINARY HEARING**, together with all exhibits, has been furnished either electronically or by U.S. First Class, postage prepaid mail to: Square One Gainesville, LLC, Attn: William Millner, 704 West Bay Street, Tampa, FL 33606; Stearns Bank, N.A., c/o Dennis Stearns, President, 324 W. Wendover Avenue, Suite 204, Greensboro, NC 27408 (via certified mail); Stearns Bank, N.A., c/o Dawn Brouillet, 4191 South 2nd Street, St. Cloud, Minnesota, 56302; Stearns Bank, N.A., c/o Joseph Edwards, Esq., Registered Agent, 201 E. Kennedy Boulevard, Suite 950, Tampa, Florida 33602; First Citrus Bank, c/o John Barrett, Chief Executive Officer, 10824 N. Dale Mabry Highway, Tampa, Florida 33618 (via certified mail); First Citrus Bank, c/o Tyler Hill, Esq., 101 East Kennedy Boulevard, Suite 3700, Tampa, Florida 33602 (per UCC-1); First Citrus Bank, c/o John T. Linton, Registered Agent, 10824 N. Dale Mabry Highway, Tampa, Florida 33618; First Citrus Bank, c/o Michael C. Markham, Esq., Johnson Pope Bokor Ruppel & Burns, LLP, 401 East Jackson Street, Tampa, FL 33602; the 20 largest unsecured creditors shown on the matrix attached to the original of this motion filed with the Court; and the U.S. Trustee, 400 W. Washington Street, Suite 1100, Orlando, Florida 32801, this 12th day of June 2017.

/s/ R. Scott Shuker

R. Scott Shuker, Esq.

Label Matrix for local noticing
113A-6
Case 6:17-bk-03856-KSJ
Middle District of Florida
Orlando
Mon Jun 12 11:17:40 EDT 2017

Square One Gainesville, LLC
704 W Bay Street
Tampa, FL 33606-2706

Alachua County Sheriff's Office
False Alarm Reduction Unit
PO Box 5489
Gainesville, FL 32627-5489

Alsco
Po Box 41149
Jacksonville, FL 32203-1149

Andrew W Rosin Esq.
1966 Hillview Street
Sarasota, FL 34239-3607

BMI
PO Box 630893
Cincinnati, OH 45263-0893

Blue Bell Creameries, LP
PO Box 973601
Dallas, TX 75397-3601

DVC Marketing
5420 Pioneer Park Blvd., Suite C
Tampa, FL 33634-4312

Florida Department of Revenue
Bankruptcy Unit
Post Office Box 6668
Tallahassee FL 32314-6668

Florida Dept of Revenue
Attn: Executive Director
5050 W Tennessee St
Tallahassee, FL 32399-0140

Gainesville Regional Utilities
PO Box 147051
Gainesville, FL 32614-7051

Griffin Industries, LLC
PO Box 530401
Atlanta, GA 30353-0401

Internal Revenue Service
Centralized Insolvency Ops
PO Box 7346
Philadelphia, PA 19101-7346

Internal Revenue Service
Post Office Box 7346
Philadelphia PA 19101-7346

John Power, Tax Collector
PO BOX 142340
Gainesville, FL 32614-2340

Louis Wohl
11101 N 46th Street
Tampa, FL 33617-2009

Main Dolphin Cleaning Ent
PO Box 6333
Clearwater, FL 33758-6333

Master Purveyors
6003 North 54th Street
Tampa, FL 33610-4830

Muzak, LLC
PO Box 71070
Charlotte, NC 28272-1070

NuCo2
PO Box 417902
Boston, MA 02241-7902

Orange County Tax Collector
PO Box 545100
Orlando FL 32854-5100

Pressure Pros LLC
20192 NE 24 Place
Williston, FL 32696-7316

Rainbow Produce
2420 N.E. 19th Drive
Gainesville, FL 32609-3319

Restaurant Magic
4010 W Boy Scout Blvd
Suite 300
Tampa, FL 33607-5762

Sea Breeze International, Inc.
P.O. Box 20442
Bradenton, FL 34204-0442

Securis Systems
5005 W Laurel St
Suite 112
Tampa, FL 33607-3896

Small Business Administratio
N Florida District Office
7825 Baymeadows Way
Jacksonville, FL 32256-7543

Square One Development, LLC
704 W Bay Street
Tampa, FL 33606-2706

Stearns Bank, NA
7555 Dr MLK Jr St N
St Petersburg, FL 33702-5205

Sunrise Produce Jacksonville
2208 West 21st Street
Jacksonville, FL 32209-4111

Sysco West Coast Florida
Sysco West Coast Florida
PO Box 1839
Palmetto, FL 34220-1839

TWC Services, Inc.
PO Box 1612
Des Moines, IA 50306-1612

Vista Serv
1509 Edgar Place
Sarasota, FL 34240-9054

West Farms Landscape
11717 SW Archer Road
Gainesville, FL 32608-5731

R Scott Shuker +
Latham Shuker Eden & Beaudine LLP
Post Office Box 3353
Orlando, FL 32802-3353

United States Trustee - ORL +
Office of the United States Trustee
George C Young Federal Building
400 West Washington Street, Suite 1100
Orlando, FL 32801-2210

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Allen Roofing, LLC

(u)Direct TV

(u)Premier Beverage

(u)Restaurant Tea Service of No Fl

End of Label Matrix	
Mailable recipients	35
Bypassed recipients	4
Total	39

EXHIBIT A

**SQUARE ONE GAINESVILLE, LLC
SQUARE ONE LAKELAND, LLC**

DAILY CASH REPORT

DAILY CASH REPORT	6/9/2017	6/10/2017	6/11/2017	6/12/2017	6/13/2017	6/14/2017	6/15/2017	6/16/2017	6/17/2017	6/18/2017	6/19/2017
BEGINNING CASH BALANCE	\$0.00	\$0.00	\$0.00	\$0.00	\$55,948.26	\$69,448.26	\$64,698.26	\$56,698.26			\$17,198.26
INCOME											
PRIOR DAY MERCHANT											
Prior Day Cash				\$100,000.00	\$30,000.00	\$25,000.00	\$25,000.00	\$30,000.00			\$95,000.00
Travelzoo/Groupon/UBER/Pepsi				\$5,000.00	\$1,500.00	\$1,500.00	\$1,500.00	\$1,500.00			\$5,000.00
Insurance/Payroll Reimb						\$8,000.00	\$10,000.00				
Capital Contributions							\$10,000.00				
TOTAL INCOME	\$0.00	\$0.00	\$0.00	\$105,000.00	\$31,500.00	\$34,500.00	\$36,500.00	\$41,500.00			\$100,000.00
Blue Bell						\$ (750.00)					\$ (5,000.00)
Misc Vendors											
SeaBreeze											
Weyand Foods				\$ (1,500.00)	\$ (1,500.00)	\$ (500.00)	\$ (1,000.00)				\$ (1,500.00)
SYSCO				\$ (13,000.00)	\$ (15,000.00)		\$ (20,000.00)				\$ (13,000.00)
MASTERS				\$ (4,000.00)	\$ (1,500.00)		\$ (1,000.00)				\$ (4,000.00)
LIQUOR CHARGES				\$ (30,551.74)							
UNITED HEALTHCARE											
SALES TAX											
BLUECROSS BLUE SHIELD											
PAYROLL- STORES						\$ (38,000.00)					\$ (9,573.27)
DEV PAYROLL								\$ (80,000.00)			
FCCI (GL/PROP/WC/EPLI)							\$ (8,500.00)				
RENT											
TOTAL EXPENSES	\$0.00	\$0.00	\$0.00	\$ (49,051.74)	\$ (18,000.00)	\$ (39,250.00)	\$ (44,500.00)	\$ (81,000.00)			\$ (33,073.27)
ENDING CASH BALANCE	\$0.00	\$0.00	\$0.00	\$55,948.26	\$69,448.26	\$64,698.26	\$56,698.26	\$17,198.26			\$84,124.99

	6/20/2017	6/21/2017	6/22/2017	6/23/2017	6/24/2017	6/25/2017	6/26/2017	6/27/2017	6/28/2017	6/29/2017	6/30/2017	7/1/2017	7/2/2017
\$	84,124.99	\$ 25,124.99	\$ (14,125.01)	\$ (28,625.01)			\$ (5,625.01)	\$ 43,654.22	\$ 49,654.22	\$ 40,404.22	\$ 25,904.22		
\$	27,500.00	\$ 22,500.00	\$ 25,000.00	\$ 27,500.00			\$ 95,000.00	\$ 27,500.00	\$ 22,500.00	\$ 25,000.00	\$ 27,500.00		
\$	1,500.00	\$ 1,500.00	\$ 1,500.00	\$ 1,500.00			\$ 5,000.00	\$ 1,500.00	\$ 1,500.00	\$ 1,500.00	\$ 1,500.00		
\$		\$ 8,000.00							\$ 8,000.00		\$ 10,000.00		
\$	29,000.00	\$ 32,000.00	\$ 26,500.00	\$ 29,000.00			\$ 100,000.00	\$ 29,000.00	\$ 32,000.00	\$ 26,500.00	\$ 39,000.00		
\$	(750.00)	\$ (750.00)							\$ (750.00)				
\$	(5,000.00)	\$ (5,000.00)	\$ (5,000.00)	\$ (5,000.00)			\$ (5,000.00)	\$ (5,000.00)	\$ (5,000.00)	\$ (5,000.00)	\$ (5,000.00)		
\$	(1,500.00)	\$ (500.00)	\$ (1,000.00)				\$ (1,500.00)	\$ (1,500.00)	\$ (500.00)	\$ (1,000.00)			
\$	(15,000.00)	\$ (20,000.00)	\$ (20,000.00)				\$ (13,000.00)	\$ (15,000.00)		\$ (20,000.00)			
\$	(1,500.00)	\$ (1,000.00)	\$ (1,000.00)	\$ (1,000.00)			\$ (4,000.00)	\$ (1,500.00)		\$ (1,000.00)	\$ (1,000.00)		
\$	(65,000.00)	\$ (65,000.00)					\$ (27,220.77)						
\$	(88,000.00)	\$ (71,250.00)	\$ (41,000.00)	\$ (6,000.00)			\$ (50,720.77)	\$ (23,000.00)	\$ (41,250.00)	\$ (41,000.00)	\$ (86,000.00)		
\$	25,124.99	\$ (14,125.01)	\$ (28,625.01)	\$ (5,625.01)			\$ 43,654.22	\$ 49,654.22	\$ 40,404.22	\$ 25,904.22	\$ (21,095.78)		

	7/3/2017	7/4/2017	7/5/2017	7/6/2017	7/7/2017	7/8/2017	7/9/2017	7/10/2017	7/11/2017	7/12/2017	7/13/2017	7/14/2017	7/15/2017	7/16/2017
\$ (21,095.78)			\$ 26,960.95	\$ (5,289.05)	\$ (16,789.05)			\$ (10,289.05)	\$ 52,710.95	\$ 58,710.95	\$ 54,460.95	\$ 41,960.95	\$ (24,539.05)	
\$ 95,000.00			\$ 40,000.00	\$ -	\$ 27,500.00			\$ 95,000.00	\$ 27,500.00	\$ 22,500.00	\$ 25,000.00	\$ 27,500.00		
\$ 5,000.00			\$ 2,000.00	\$ 500.00	\$ 500.00			\$ 5,000.00	\$ 1,500.00	\$ 1,500.00	\$ 1,500.00	\$ 1,500.00		
\$ 4,000.00			\$ 8,000.00							\$ 8,000.00		\$ 10,000.00		
\$ 104,000.00			\$ 50,000.00	\$ 500.00	\$ 28,000.00			\$ 100,000.00	\$ 29,000.00	\$ 32,000.00	\$ 26,500.00	\$ 39,000.00		
\$ (5,000.00)			\$ (750.00)	\$ (5,000.00)	\$ (5,000.00)			\$ (5,000.00)	\$ (5,000.00)	\$ (750.00)	\$ (5,000.00)	\$ (5,000.00)		
\$ (1,500.00)			\$ (1,000.00)	\$ (1,000.00)	\$ (1,000.00)			\$ (1,500.00)	\$ (1,500.00)	\$ (500.00)	\$ (1,000.00)	\$ (1,000.00)		
\$ (15,000.00)			\$ 20,000.00	\$ 20,000.00				\$ (13,000.00)	\$ (15,000.00)		\$ (20,000.00)			
\$ (13,000.00)			\$ (12,000.00)	\$ (12,000.00)				\$ (4,000.00)	\$ (1,500.00)		\$ (1,000.00)	\$ (1,000.00)		
\$ (4,000.00)			\$ (1,500.00)	\$ (1,500.00)										
\$ (9,573.27)			\$ (62,000.00)							\$ (30,000.00)				
\$ (7,870.00)			\$ (12,000.00)	\$ (14,000.00)	\$ (14,000.00)			\$ (13,500.00)				\$ (24,500.00)		
\$ (55,943.27)			\$ (82,250.00)	\$ (12,000.00)	\$ (21,500.00)			\$ (37,000.00)	\$ (23,000.00)	\$ (36,250.00)	\$ (39,000.00)	\$ (105,500.00)		
\$ 26,960.95			\$ (5,289.05)	\$ (16,789.05)	\$ (10,289.05)			\$ 52,710.95	\$ 58,710.95	\$ 54,460.95	\$ 41,960.95	\$ (24,539.05)		

	7/17/2017	7/18/2017	7/19/2017	7/20/2017	7/21/2017	7/22/2017	7/23/2017	7/24/2017	7/25/2017	7/26/2017	7/27/2017	7/28/2017
\$	(24,539.05)	\$ 37,435.50	\$ 43,435.50	\$ 7,185.50	\$ 6,685.50			\$ 2,685.50	\$ 92,185.50	\$ 98,185.50	\$ 93,935.50	\$ 93,435.50
\$	95,000.00	\$ 27,500.00	\$ 22,500.00	\$ 25,000.00	\$ 27,500.00			\$ 95,000.00	\$ 27,500.00	\$ 22,500.00	\$ 25,000.00	\$ 27,500.00
\$	5,000.00	\$ 1,500.00	\$ 1,500.00	\$ 1,500.00	\$ 1,500.00			\$ 5,000.00	\$ 1,500.00	\$ 1,500.00	\$ 1,500.00	\$ 1,500.00
			\$ 8,000.00							\$ 8,000.00		\$ 10,000.00
\$	100,000.00	\$ 29,000.00	\$ 32,000.00	\$ 26,500.00	\$ 29,000.00			\$ 100,000.00	\$ 29,000.00	\$ 32,000.00	\$ 26,500.00	\$ 39,000.00
			\$ (750.00)							\$ (750.00)		
\$	(5,000.00)	\$ (5,000.00)	\$ (5,000.00)	\$ (5,000.00)	\$ (5,000.00)			\$ (5,000.00)	\$ (5,000.00)	\$ (5,000.00)	\$ (5,000.00)	\$ (5,000.00)
\$	(1,500.00)	\$ (1,500.00)	\$ (500.00)	\$ (1,000.00)				\$ (1,500.00)	\$ (1,500.00)	\$ (500.00)	\$ (1,000.00)	
				\$ (20,000.00)					\$ (15,000.00)		\$ (20,000.00)	
\$	(4,000.00)	\$ (1,500.00)		\$ (1,000.00)	\$ (27,000.00)			\$ (4,000.00)	\$ (1,500.00)		\$ (1,000.00)	\$ (27,000.00)
\$	(27,525.45)				\$ (1,000.00)						\$ (1,000.00)	\$ (1,000.00)
			\$ (62,000.00)							\$ (30,000.00)		
\$	(38,025.45)	\$ (23,000.00)	\$ (68,250.00)	\$ (27,000.00)	\$ (33,000.00)			\$ (10,500.00)	\$ (23,000.00)	\$ (36,250.00)	\$ (27,000.00)	\$ (108,000.00)
\$	37,435.50	\$ 43,435.50	\$ 7,185.50	\$ 6,685.50	\$ 2,685.50			\$ 92,185.50	\$ 98,185.50	\$ 93,935.50	\$ 93,435.50	\$ 24,435.50

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION
www.flmb.uscourts.gov

In re:

CASE NO.: 6:17-bk-03856

CHAPTER 11

SQUARE ONE GAINESVILLE, LLC

Debtor.

_____ /

**FIRST INTERIM ORDER GRANTING DEBTOR'S EMERGENCY MOTION
TO USE CASH COLLATERAL AND NOTICE OF CONTINUED HEARING**

[Continued Hearing:]

THIS CASE came on for emergency preliminary hearing on _____, 2017 (the "Hearing") upon the *Emergency Motion for Authority to Use Cash Collateral*, filed by Square One Gainesville, LLC (the "Debtor") on June 12, 2017 (Doc. No. __) (the "Motion"). Upon consideration of the Motion, the evidence presented, the arguments of counsel present at the Hearing, it is

ORDERED:

1. Interim Authorization Granted. The Motion is granted on an interim basis as provided herein.

EXHIBIT "B"

2. Cash Collateral Authorization. Subject to the provisions of this order, the Debtor is authorized to use cash collateral to pay: (a) amounts expressly authorized by this Court, including payments to the United States Trustee for quarterly fees; (b) the current and necessary expenses set forth in the budget attached as Exhibit A attached to the Motion, plus an amount not to exceed ten (10) percent for each line item; and (c) such additional amounts as may be expressly approved in writing by Stearns Bank. This authorization will continue through _____, however, the parties may jointly agree to extend the authorization by submitting an agreed order reflecting such extension. Except as authorized in this order, the Debtor is prohibited from the use of cash collateral.

3. Debtor Obligations. The Debtor shall timely perform all obligations of a debtor-in-possession required by the Bankruptcy Code, Federal Rules of Bankruptcy Procedure, and the orders of this Court.

4. Replacement Lien. Stearns Bank shall have a perfected post-petition lien against cash collateral to the same extent and with the same validity and priority as the prepetition lien, without the need to file or execute any documents as may otherwise be required under applicable non-bankruptcy law.

5. Insurance. The Debtor shall maintain insurance coverage for its property in accordance with the obligations under the loan and security documents with Stearns Bank.

6. Without Prejudice. This Order is without prejudice to: (a) any subsequent request by a party-in-interest for modified adequate protection or restrictions on use of Cash Collateral; or (b) any other right or remedy which may be available.

7. Creditors Committee. The provisions of this Order are without prejudice to the rights of the United States Trustee to appoint a committee or any rights of a duly-appointed

committee to timely challenge the validity, priority, or extent of any lien(s) asserted against cash collateral.

8. Enforcement. The Court shall retain jurisdiction to enforce the terms of this Order.

Attorney R. Scott Shuker is directed to serve a copy of this order on interested parties and file a proof of service within three (3) days of entry of the order.