UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

In re: THE LINEN LOCKER, LLC

Case No. 18-bk-05188

Chapter 11

Debtor.
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DEBTOR'S EMERGENCY MOTION FOR AUTHORITY TO UTILIZE CASH COLLATERAL

THE LINEN LOCKER, LLC (the "Debtor") by and through its undersigned attorney, as debtor and debtor-in-possession, by and through its undersigned attorney, hereby files its Emergency Motion for Authority to Utilize Cash Collateral (the "Motion") and in support of this Motion the Debtor states as follows:

Jurisdiction and Venue

1. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§ 157 and 1334.
2. The subject matter of this Motion is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The statutory predicate for the relief sought herein is 11 U.S.C. §§ 361 and 363 of the Bankruptcy Code.

Background

4. On June 22, 2018 (the "Petition Date") the Debtor filed its Voluntary Petition for Relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code").

5. The Debtor continues to operate its business and manage its property as debtor in possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code.
6. No trustee or examiner has been appointed in this case and no official committee has yet been appointed pursuant to §1102 of the Bankruptcy Code.
7. The Debtor is the owner and operator of THE LINEN LOCKER, LLC which is dry cleaning and laundry company with its principal places of business in Manatee and Sarasota Counties in, Florida.
8. Debtor has, prior to the Petition Date, executed a loan agreement in favor of Swift Financial, LLC on a secured basis, pursuant to which the Debtor granted security interests in collateral owned by the Debtor, specifically its accounts receivable. To the Debtor's knowledge, there are no other liens on the cash collateral.
9. The amount of the secured debts due to Swift Financial, LLC is approximately $18,768.72. According to its schedules, the Debtor's assets are valued as of filing as follows:

a.	Machinery, fixtures and equipment	365,000
b.	Accounts receivable	90,000
c.	Cash in bank (estimated)	2,000
	<u>Total $457,000</u>	

<u>Relief Requested and Grounds for Relief</u>

10. The Debtor seeks authority to use the Cash Collateral to continue operating the business and to manage its financial affairs in compliance with its established budgetary expenses as set forth in the Six-Month Budget attached as Exhibit A.
11. Accordingly, Debtor seeks entry of an interim order authorizing the use of Cash

Collateral to avoid immediate and irreparable harm to the estate pending a final hearing and the entry of a final order.

12. The Debtor has apparent equity and the value of its accounts receivable and cash grossly outweigh the secured debt due to Swift Financial, LLC. The assets have equity and it adequately protects the creditor's interest in this matter without the necessity of Debtor being restricted from the use of its cash collateral.
13. In addition, the Debtor would seek an interim order providing Swift Financial, LLC with adequate protection payments.
14. If allowed to use its cash collateral, Debtor believes that it can stabilize its business operations and maintain going-concern value. Otherwise, its business operations will cease and the assets will have only limited liquidation value.
15. The relief requested by Debtor is narrowly tailored and will not unduly prejudice the secured creditor and it is in the best interest of the estate as well as the unsecured creditors.
16. No previous application for the relief sought herein has been made by the Debtor to this Court or to any other court.
17. The relief sought is in the nature of a "First Day Motion" which is generally recognized as a necessity in Chapter 11 cases.

WHEREFORE, the Debtor respectfully requests that this Court enter an Order granting this Motion *nunc pro tunc* to the Petition Date, and authorizing the use of cash collateral on an interim basis, and for such other and further relief as is just.

DATED on this 22nd day of June, 2018.

Respectfully submitted,

__*/s/Samantha L. Dammer*_____________
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of June, 2018, a true and correct copy of the foregoing was sent by CM/ECF Electronic mail to all parties of interest on the Court's CM/ECF System.

Respectfully submitted,

__*/s/ Samantha L. Dammer*_________________
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