

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF FLORIDA
PANAMA CITY DIVISION

IN RE: AMERICAN STEEL
PROCESSING COMPANY

CHAPTER 11
CASE NO.: 18-50060-KKS

Debtor.

_____ /

EMERGENCY MOTION FOR AUTHORITY TO USE CASH COLLATERAL
AND FOR EMERGENCY HEARING

COMES NOW, AMERICAN STEEL PROCESSING COMPANY, and files this Motion for Authority to Use Cash Collateral in Accordance with 11 U.S.C. § 363 and Administrative Order 05-001 and states as follows:

Factual and Procedural Background

1. On February 26, 2018, AMERICAN STEEL PROCESSING COMPANY, filed with this Court a Petition under Chapter 11 of the United States Bankruptcy Code, 11 U.S.C. § 101 *et seq.* (the "Code"). AMERICAN STEEL PROCESSING COMPANY continues to maintain possession of its property and operate its business as a debtor in possession pursuant to sections 1107 and 1108 of the Code.
2. Prior to the commencement of this case, the Debtor executed and delivered to numerous creditors various security agreements and UCC-1 Financing Statements pledging a security interest in equipment being purchased by Debtor. Prior to filing the Chapter 11, counsel for the Debtor and his staff spent numerous hours reviewing and seeking to determine the nature and extent of each secured creditor's security interest and seeking to match equipment with security agreements and financing statements. A copy of the summary of creditors and financing statements is attached as Exhibit A.

3. A copy of the Summary of Summit's UCC-1 financing statements and a description of its collateral is attached as Exhibit B.
4. Prior to filing, the Debtor cooperated with Summit Bank, N.A. (hereinafter Summit) in conducting an appraisal of its collateral.
5. The Debtor's equipment list for the bankruptcy schedules was at one time over 50 pages and has been reduced by laborious review to about 46 to 48 pages and the review is ongoing due to the difficulty in matching UCC-1 filings with various equipment lists.
6. Summit asserts a security agreement in accounts receivable, specific items of equipment, and a blanket security interest in all equipment.
7. In order to seek to determine the value of Summit's security interest, the Debtor, through counsel, sought to receive a copy of Summit's appraisal to further assist the parties in determining the extent of Summit's security interest.
8. Summit has refused to share its appraisal.
9. Pre-filing, Summit took the position that it was fully secured and the Debtor did not initially dispute this assertion as neither party had a full understanding of what equipment was unencumbered and subject to Summit's blanket lien, what equipment which was subject to superior liens had equity, if any, to be subject to Summit's lien, and the value of the accounts receivable.
10. Prior to filing the Chapter 11, the Debtor attempted to work out a pre-filing cash collateral agreement.

11. The Debtor's analysis of Summit's secured position indicates that Summit is significantly under secured.
12. As of the date of filing, Summit had a lien on known accounts receivable of \$129,619.24 which was due from Covanta. The receivable was paid into the Debtor's pre-petition restricted account at Summit Bank and Summit has frozen the account and refused to release the funds.
13. The funds on deposit are essential and necessary for the Debtor to operate.
14. The Debtor's principal officer, Tom Fanell, personally advanced funds to the Debtor post-petition and after Summit refused to enter into a temporary cash collateral agreement, in order to avoid bouncing payroll checks and to keep the company operational. A separate motion for reimbursement is being filed with this motion.
15. Also, at the time of filing, there were accounts receivable which were being generated by the Debtor through Covanta which had not been billed. The amount of the work in progress was unknown at the time of filing and this was made known to counsel for Summit as an additional reason a temporary cash collateral order needed to be entered into. The Debtor requested at least a 60 day agreement to pay adequate protection on known collateral with the opportunity to reevaluate matters once more information and details were learned.
16. The forgoing offer was rejected as Summit did not want to negotiate on a temporary basis but is seeking to be paid the full amount of its debt to the detriment of all creditors in the case when it is clearly under secured.

17. It should be noted that Commercial Credit had a lien against the Debtor's accounts receivable; however, Commercial Credit either relinquished or subordinated their claim to Summit in this matter according to information supplied by counsel for Summit, even though no official subordination has been recorded in the public records with the Secretary of State for the State of Florida.
18. As of February 26, 2018, the total principal indebtedness owing by the Debtor to Summit was approximately \$1,682,427.31 together with interest since December 11, 2017 plus costs and attorney fees.
19. Summit's secured interest in accounts receivable, inventory and equipment which are known to the Debtor as follows:
 - \$183,298.20 (for lien on accounts receivable and unencumbered equipment)
 - \$150,000.00 (for the 2014 Liebherr Crane ending in 4528)
 - \$100,000.00 (for the 2015 Liebherr Crane ending in 3246)for a total secured interest of \$433,298.20.
20. At the present time, it is imperative that the Debtor obtain authority from this Court, in accordance with 11 U.S.C. § 363(c)(2)(B), to use cash collateral in order to maintain its business operations and protect its ability to reorganize in accordance with chapter 11 of the Code.
21. The Debtor and Summit have not reached an agreement regarding use of cash collateral nor adequate protection as of the filing of this Motion.
22. Should the Court grant the Debtor's Motion to Use Cash Collateral, not only would it benefit Summit, but it would also benefit the overall reorganizational efforts of

the Debtor by allowing it to make initial proposed adequate protection payments as outlined in the attached Exhibit C.

Relief Requested

23. 11. In accordance with section 363(c)(2)(B) of the Code, the Debtor requests that this Court authorize and approve the Debtor's use of cash collateral for the payment of its operating expenses such as electric and other utility bills, employees, purchase materials, pay for insurance, make repairs and otherwise operate its business and use same to make an adequate protection payments to Summit and the other secured creditors as outlined in the aforementioned Exhibit C.

24. In the event this Court does not authorize the Debtor's use of cash collateral, the Debtor believes it will be unable to maintain its current business operations and propose a plan of reorganization as contemplated by the Bankruptcy Code. Without the use of cash collateral, the Debtor will be seriously and irreparably harmed, resulting in significant losses to the Debtor's estate and its creditors.

Request for Emergency Hearing


25. Debtor requires money to pay for ongoing business expenses, pay utilities and those expenses customarily associated with the operation and management of a fast paced national business as it has locations in Florida, Alabama, and Pennsylvania, and to pay for other indispensable purposes. Failure to timely pay such items will require Debtor to close down entirely all of its operations, which will result in irreparable injury to Debtor, its creditors, and prevent its chances for an effective reorganization.

26. Therefore, it is in the best interest of the Debtor and its creditors for this matter to be heard as soon as practicable by the Court.

WHEREFORE, AMERICAN STEEL PROCESSING COMPANY requests that this Court hold an expedited hearing for the interim use of Cash Collateral and enter an order pursuant to 11 U.S.C. § 363(c)(2)(B) authorizing the Debtor to use cash collateral for its general ongoing business operations as described in this Motion and to grant AMERICAN STEEL PROCESSING COMPANY such other and further relief as may be proper and just.

Dated: March 1, 2018.

Respectfully submitted,


/s/ Charles M. Wynn

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ATTORNEY FOR DEBTOR
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Stat Creditor Number

UCCs Filing

Collateral

135 FL Commercial Credit Group Inc 200900111893 Three (3) 1998 J&J Aluminum 34' Triaxle Trailers VIN: 1S92A3532WM006840, 1S92A3532WM006837, 1S92A3530WM006836

One (1) 1995 J & B Tri Axle Dump Trailer VIN: AJ9DT3637SP188154
One (1) 1988 Tribbook Tri Axle Dump Trailer VIN: 1T9BSAN34JB021445

124 FL Commercial Credit Group Inc 201001909494 accounts receivables +
One (1) 2000 New Holland EC215 Material Handler SN: 721543

One (1) Winkle 58" Magnet SN: MGN0583

112 FL Commercial Credit Group Inc 201002758546 accounts receivables +
One (1) MGL 4048 Heavy Duty Conveyor SN: 4048047
Eight (8) Borco 40 Yard Open Top Containers SN: 091940 through 091947

Four (4) Borco 20 Yard Open Top Containers BOR0106-BOR0109

109 FL Commercial Credit Group Inc 201002835850 accounts receivables +
One (1) 1984 Clark Michigan 55C Wheel Loader 481B306CB
One (1) 2005 Atlas Copco 100 KW Model # QAS108PD Generator SN: USA102669

accounts receivables +

105 FL Commercial Credit Group Inc 201103971113 (1) 1998 Extec Model 3600 Shredder SN: 6TB17531

accounts receivables

92 FL Commercial Credit Group Inc 201105443637 MGL Handy Screen, EX, SN: HSEX96016C Extended Conveyor:
MGL 4048 Conveyor, SN: 4048050 w/3 cu. Yd. Hopper and Trio CRP42
Cross Belt Magnet:
MGL 4030 Conveyor, SN 4030251 w/Hydraulic coupling Unit:
2007 John Deere Model 544J Wheel Loader SN: DW544JZ611782
1998 JCB Model 510-40 Forklift SN:576854

John Deere 200 Excavator S/N: 512528

90 FL John Deere Construction & Forestry Company 201105583595

accounts receivables

86 FL Commercial Credit Group Inc 201206244060 2006 East Trailer VIN: 1E1F9U2866RF374444
2001 Mac Lan Trailer VIN: 5MATN48231COO4598
2001 East Trailer VIN: 1E1U1Y2842RH31406

John Deere 5442 Wheel loader S/N: 623799

82 FL John Deere Construction & Forestry Company 201206541529
78 FL John Deere Construction & Forestry Company 201207051525

John Deere 328D Skid Steer Loader S/N: 198787
John Deere 328D Skid Steer Loader S/N: 206708

Exhibit A

77 FL Wells Fargo Equipment 201207097207 MGL Model EX2 Screen Print, S/N: HSEX2001, with 72 inch Belt, CRP 42
Finance, Inc Inch Magnet,

Two (2) 6ft x 8ft Screen Boxes
and 99hp Kubota Engine

74 FL Commercial Credit Group Inc 20120729231X accounts receivables +
73 FL Wells Fargo Equipment 201207329213 One (1) MGL Model 4048 Conveyor, S/N: 4048051, with 6 cubic yard
Finance, Inc hopper, Deutz 74 hp unit, CRP 42 inch Magnet

One (1) MGL Model 3930 Conveyor, S/N: 3930027
accounts receivables +

69 FL Commercial Credit Group Inc 201207414954
68 FL Nations Fund I, LLC 201207449359
One (1) 2000 USTS Dump Trailer Vin: IU9FA4224Y1051954
One (1) 2000 USTS Dump Trailer VIN: IU9FA4229Y1051903
One (1) 1990 J&J Dump Trailer VIN: 1S9ST02040LM006034
One (1) 1989 Cobra Dump Trailer VIN: 1C1FA3982K2133213

Gunderson High Side Gondola 100 Ton Railcars AGR 119712
Gunderson High Side Gondola 100 Ton Railcars AGR 119756
Gunderson High Side Gondola 100 Ton Railcars AGR 119781
Gunderson High Side Gondola 100 Ton Railcars AGR 119806
Gunderson High Side Gondola 100 Ton Railcars AGR 119823
Gunderson High Side Gondola 100 Ton Railcars AGR 119841
Gunderson High Side Gondola 100 Ton Railcars AGR 119890
Gunderson High Side Gondola 100 Ton Railcars AGR 119956
Gunderson High Side Gondola 100 Ton Railcars AGR 119961
Gunderson High Side Gondola 100 Ton Railcars AGR 174200
Gunderson High Side Gondola 100 Ton Railcars AGR 174206
Gunderson High Side Gondola 100 Ton Railcars AGR 174267
Gunderson High Side Gondola 100 Ton Railcars AGR 174288
Gunderson High Side Gondola 100 Ton Railcars AGR 585556
Gunderson High Side Gondola 100 Ton Railcars AGR 585568
Gunderson High Side Gondola 100 Ton Railcars AGR 585575
Gunderson High Side Gondola 100 Ton Railcars AGR 586026
Gunderson High Side Gondola 100 Ton Railcars AGR 586155
Gunderson High Side Gondola 100 Ton Railcars AGR 586202
Gunderson High Side Gondola 100 Ton Railcars AGR 586254
John Deere Model 330 B Material Handler w/Magnetic Attachment
Serial #WC330BX011104 mounted on Freightliner Cascadia Chassis
1FUJA6CV64LMS6870

65 FL John Deere Construction & Forestry Company 20120759894X John Deere 200 Excavator S/N: 512027

66 FL John Deere Construction & Forestry Company 201207598990 John Deere 200 Excavator S/N: 510630

Used 2007 Sterling Model LT9500 Series Tri Axle Rolloff Truck, powered by Mercedes Benz OMA60LA, 12.8L, 450 HP diesel engine and Eaton Fuller 8L, 10 speed transmission, equipped with 2006 Galbreath Model UR-OR-174, 60,000# rolloff hoist, s/n 13H26755, with 23' rails and tarp system, 20,000# front and 44,000# rear axles, air/lift 3rd axle with 11R24.5 tires, spring suspension, engine brake, PTO, aluminum front and steel rear disc wheels, air conditioning, power windows, and 425/65R22.5 front and 11R22.5 rear tires 2FZHAZCV77AX37824

USED 1986 Peterbilt Model 349H Tandem Axle Cab & Chassis equipped with Peerless crane and Ohio 48" magnet 1XP4D29X3GN202134

USED 2004 Freightliner Model CL120 Tandem Axle Truck Tractor, powered by Mercedes Benz MBE 4000, 12.8L, 450 HP diesel engine and Eaton Fuller FR0-15210C, 10 speed transmission, equipped with 12,000# front and 40,000# rear axles, air ride suspension, PTO, wetline, engine brake, 5th wheel, single frame 170" wheelbase, aluminum disc wheels, side frame farrings, air conditioning, cruise control, and 295/75R22.5 tires 1FJJA6CV04LM56864

USED 1997 Peterbilt Model 379 Tandem Axle Truck Tractor
1XP5DB9X9HN213001

USED 2005 Sterling Model LT9500 Series Tri Axle Rolloff Truck powered by Mercedes Benz MBE4000, 12.8L diesel engine and Eaton Fuller 8L, 10 speed transmission, equipped with 2004 Rudco model O/R TR1, 60,000# rolloff hoist, s/n HRP61052, with 23' rails and tarp system, 18,000# front and 46,000# rear axles, air/lift 3rd axles with 11R24.5 tires, air ride suspension, PTO, aluminum disc wheels, air conditioning, and 385/65R22.5 front and 11R24.5 rear tires 2FZHAZCV35AN75588

USED 2008 Eager Beaver Model 50GSL/BR3, 50 Ton Tri Axle Detachable Lowboy Trailer, Equipped with 24'x102" level deck, rear deck over wheels, 4' beavertrail with 8' hydraulic ramps, non-ground bearing gooseneck, wetline (capped) gas pony motor, air ride suspension, outriggers, aluminum disc wheels, tie downs, and 255/70R22.5 tires 112SB25078L072916

Used 1991 BENLEE Model TA60DD45, 45' Tandem Axle Rolloff Trailer equipped with 60,000# capacity, wetline, hydraulic winch, single hoist cylinder, 34'6" rails, 10'4" spread axle, air ride suspension, steel disc wheels, and 255/70R22.5 tires 1B9B14525MA180719

Used 2007 John Deere Model 544 J Rubber Tired Loader, s/n DW544J2614340, POWERED BY Deere 6068H diesel engine and powershift transmission, equipped with general purpose loader bucket with bolt-on cutting edge, quick disconnect (coupler missing hydraulic cylinder), joystick controls, enclosed ROPS cab with air conditioning, and 20.5-25L5 foam filled tires. In good condition with very good tires DW544J2614340

Used 2006 John Deere Model 250D, 25 Ton 6x6 Articulated End Dump, s/n BE250DT201634, powered by Deere diesel engine and powershift transmission, equipped with non-heated steel dump body, enclosed ROPS cab with air conditioning and power mirrors, and 23.5R25 tires. In good condition with good tires. BE250DT201634

61 FL John Deere Construction & Forestry Company 201309048132 John Deere 544 K Wheel Loader S/N: 635985

60 FL Commercial Credit Group Inc 201309241986 accounts receivables +
 One (1) 2005 Multiquip DCA220 SSV Generator SN: 375-6545
 One (1) 1994 Freightliner Tri-Axle Chassis with 20' aluminum body VIN: 1FV7F0Y93RH647690
 Four (4) 60-36 conveyors with 10 hp motors

57 FL RLC Funding a Division of Navitas Lease Corp 201309647818 2- 36"X60' Radial Stacker Conveyor
 2- Standard Rectangular Roll Off Container Serial Number: 32337, 32338

55 FL Wells Fargo Equipment Finance, Inc 201309681846 One (1) Hyundai Model 210W-9MH Hydraulic Excavator, S/N HZ609D000006

56 FL Wells Fargo Equipment Finance, Inc 201309681854 One (1) Hyundai Model 140W-9 Hydraulic Excavator, S/N HZ403PD0000509

54 FL Commercial Credit Group Inc 201309750643 accounts receivables +
 One (1) 2013 MGL EX1 Portable Screenplant SN: MGLEX1001

53 FL Commercial Credit Group Inc 201309940000 accounts receivables +
 Two (2) Flip Screen Power Screens SN: WL13004130091 and WL13004130089

48 FL Commercial Credit Group Inc 201309998300 accounts receivables +

One (1) 2013 MGL Model EX1 Portable Screen Polant S/N/VIN: MGLEX1002

47 FL Commercial Credit Group Inc 201300006240 accounts receivables +

One (1) 2013 Hyundai Skid Steer Loader HSL 850-7A with SN: S70210003 with
 One (1) S-30 Grapple Bucket/Glip Screen Bucket SN: S30-0612-0145

46	FL	Sunsouth Capital, Inc	201300035844	2011 John Deere Model 450-J Crawler Dozer - SN- 1T0450JXPB0201153
42	FL	John Deere Construction & Forestry Company	201300104897	John Deere 544K Wheel Loader S/N: 655682
43	FL	John Deere Construction & Forestry Company	201300104900	John Deere 544K Wheel Loader S/N: 655685
41	FL	Regions	20130011968X	Powerscreen Serial Number 12303268
39	FL	Summit Bank, NA	201300455428	all inventory and accounts receivables +
40	FL	Summit Bank, NA	201300455886	A Blanket lien on all Furniture, Fixtures and Equipment
37	FL	Commercial Credit Group Inc	201400492155	accounts receivables +
				2007 Viper 107C Sreenplant JB1392
				1997 Clark Michigan 55C Wheel Loader 481B306CB
				2005 Atlas Copco KW Model #0AX108PD Generator USA 102669
				MGL 4048 Heavy Duty Conveyor 4048047
				2000 New Holland EC215 Material Handler 721543
				Winkle 58" Magnet MGN0583
				2007 John Deere 544J Wheel Loader DW544JZ614970
				2007 John Deere 544J Wheel Loader DW544JZ614435
				Eight (8) Borco 40 Yard Open Top Containers 091940-091947
				Four (4) Borco 20 Yard Open Top Containers BOR0106-BOR0109
				1998 J&J Dump Trailer 1S92A3532WM006840
				1998 J&J Dump Trailer 1S92A3532WM006837
				1998 J&J Dump Trailer 1S92A3530WM006836
				1995 JB Enterprises Dump Trailer AJ9DT3637SP88154
				1998 TI Brook Dump Trailer 1T9BSAN34JB0211445
35	FL	Commercial Credit Group Inc	201400567287	2006 Dodge Service Truck with Gas Welders and Air Compressors
				3D6WL46C566G180147
				2006 Dodge Service Truck with Gas Welders and Air Compressors
				3D7ML46C8G180145
				2000 USTS Dump Trailer IU9FA4224Y1051954
				2000 USTS Dump Trailer IU9FA422Y1051903
				1990 J&J Dump Trailer 1S9ST0240LM006034
				1989 Cobra Dump Trailer 1CPFA39B2K2133213
				2005 Hydro A-902 Material Handler w/ new 105 kw Generator, new 45" magnet and new lift cylinders A-902-359-5469
				2002 Liebherr 914 Material Handler 672-6258
				2006 East Trailer 1E1F9U2866RF374444
				2001 Mac Lan Trailer 5MATN48231C004598
				2001 East Trailer 1E1U1Y2842RH31406
				MGL Handy Screen, EX, SN: HSEX96016C Extended Conveyor:

MGL 4048 Conveyor, SN: 4048050 w/3 cu. Yd. Hopper and Trio CRP42
 Cross Belt Magnet:

MGL 4030 Conveyor, SN 4030251 w/Hydraulic coupling Unit:

2007 John Deere 5441 DW54412611782

1998 JCB Model 510-40 Forklift SN:576854

MGL Packaged engineering skid including: Feedhopper with 42" conveyer w/43" trio over band magnet w/support w/42" overs folding band magnet w/support w/36" nonfe product double fold conveyer

MGL 3630 Screen Plant fitted with 36" over-band magnet and double-deck wire mesh screen, 2 sets (1 set 3/4" and 1 set 1/2") w/variable speed feeder currenent system for nonfe metals globals magnetics, inc (ECS125)

MGL 55' drop deck 2-axle road trailer with hydraulic stabilizers

MGL 20' weather protection enclosure w/ roll-up doors and skylights

Moley Magnetics ESB 40" Magnet System

MGL 5030 Radial Conveyers w/2x48" Magnetic Head Pulleys 5030195

MGL 5030 Radial Conveyers w/2x48" Magnetic Head Pulleys 5030200

2007 Sterling 9500 Day Cab Tractor Truck with 10-speed transmission, Air ride, Ten (10) Aluminum Wheels, Wet Line 2FWJA3CV97AY47009

2007 Sterling 9500 Day Cab Tractor Truck with 10-speed transmission, Air ride, Ten (10) Aluminum Wheels, Wet Line 2FWJA3CV77AY47011

1998 Extec 3600 Shredder 6TB17531

accounts receivables +

(1) One 2000 Ravens Dump Trailer VIN: 1R1D040251100013

(1) One 2000 Ravens Dump Trailer VIN: 1R1D040281100250

2013 John Deere Model # 544-K Wheel Loader - SN 1DW544KZCCE649148

2005 Link Belt Model #240-LX Hydraulic Excavator, ID# 8118- SN K4J5 9659U with 57" NEC Magnet ID# 799- SN MG93

2011 John Deere Model 450-J Crawler Dozer - SN- 1T0450JXPB0201153

Case No	Debtor	Account No	Description
320	FL Commercial Credit Group Inc	201401844098	accounts receivables +
319	FL Sunsouth Capital, Inc	201402276409	(1) One 2000 Ravens Dump Trailer VIN: 1R1D040251100013
318	FL Sunsouth Capital, Inc	201402276409	(1) One 2000 Ravens Dump Trailer VIN: 1R1D040281100250
317	FL Sunsouth Capital, Inc	201402276409	2013 John Deere Model # 544-K Wheel Loader - SN 1DW544KZCCE649148
30	FL Sunsouth Capital, Inc	201402296299	2005 Link Belt Model #240-LX Hydraulic Excavator, ID# 8118- SN K4J5 9659U with 57" NEC Magnet ID# 799- SN MG93
28	FL Nations Fund I, LLC	201402553372	2011 John Deere Model 450-J Crawler Dozer - SN- 1T0450JXPB0201153

Liebherr D934S diesel engine and hydraulic drive, with 13'4" stick, auxiliary hydraulics, Winkle model LDSA, 53: electric magnet, 15KW generator, enclosed cab with air conditioning, 15' crawlers, and 30" TBG pads 983-18774

Sennebogen Deere 4045H diesel engine and hydraulic drive equipped with 44' working radius, 15'9" stick, auxiliary hydraulics, Winkle 58" electric magnaet, s/n MGN0583, 13 KW generator, enclosed ROPS cab with air conditioning, and 27.5" TBG pads 821.5.1037

Sennegogen Deere 4045 H reman diesel engine and hydraulic drive, with 44' working radius 15'9" stick, auxiliary hydraulics, Winkle 58" electric magnet, s/n MGN0G38, 13KW generator, hydraulic elevating cab with air conditioning, and 27.5" TBG pads 821.5.665

Liebher D934S diesel engine and 2 speed powershift transmission, with 13'4" stick, auxiliary hydraulics, LGI 48" electric magnet, 15KW generator, enclosed cab with air conditioning, (4) hydraulic outriggers, dual wheels, and 10.00-20 foam filled tires WLHZ0194LQ5039185

Liebher D934S diesel engine and 2 speed powershift transmission, equipped with 13'4" stick, auxiliary hydraulics, LGI 48" magnet, 15KW generator, enclosed cab with air conditioning, (4) hydraulic outriggers, dual wheels, and 10.00-20 foam filled tires WLHZ9332CZK013799

Sennebogen Deere 4045HF diesel engine and hydraulic drive, equipped with 44' working radius, 15'9" stick, auxiliary hydraulics, Winkle model 58LSA, 58" electric magnet, 15KW generator, hydraulic elevating cab with air conditioning, (4) hydraulic outriggers, and 10.00x20 tires 821.0.996

Sennegogen Deere SE4045T791358 diesel engine and hydraulic drive with 44' working radius, 15'9" stick, auxiliary hydraulics, Winkle 48" electric magnet, 17 KW generator, hydraulic elevating cab with air conditioning, (4) hydraulic outriggers, and 10.00x20 tires 821.0.996

Sennebogen Deere 4045H diesel engine and hydraulic drive, equipped with 44' working radius, 15'9" stick, auxiliary hydraulics, Winkle model 58LSA, 58" electric magnet, 15KZW generator, hydraulic elevating cab with air conditioning, (4) hydraulic outriggers, dual wheels, and 10.00-20 foam filled tires 821.0.921

Moley Electric Magnet 14138

Moley Electric Magnet 14140

Moley Electric Magnet 12462

Moley Electric Magnet 11277

Link-Belt Model 240-LX Excavator with 57" NEC Magnet, S/N MG93, K4J5-9659

John Deere diesel engine and hydrostatic transmission, with 6-way blade, push button joystick controls, ROPS canopy with front sweeps and side and rear brush guards, and 24" SBG pads, good condition with good undercarriage 201153

Kawasaki Isuzu 4HKIX diesel engine and powershift transmission, with general purpose 3.3 cubic yard loader bucket, S/N 0312-AKRR20759, with bolt-on cutting edge, enclosed ROPS cab with air conditioning, and 20.5-25 foam filled tires 65J14-5282

MGL Deutz 4 cylinder diesel engine, with 6'x9' box, 60"x24' discharge conveyor, and 235/75R17.8 tires MGL HSEX2001

MGL Deutz 4 cylinder engine, with feed hopper, 48" collecting conveyor, hydraulic raise, 48" suspended crossbelt magnet, and 235/75R17.5 tires - NOT AVAILABLE

Extac Deutz 3 cylinder diesel engine and hydraulic drive with 5'x12' feed hopper with hydraulic grizzly, 36" collecting conveyor, 36"x38' discharge conveyor, manual raise, and 5th wheel single axle trailer chassis with 385/65R22.5 tires 4055

MGL Deutz 2 cylinder diesel engine and hydraulic drive, with hydraulic folding tail section, hydraulic raise, and single axle trailer chassis with 235/75R17.5 tires 7436T001

Hemminger 15 HP electric motor and gear reducer, with (3) 20' bolt-together sections, manual raise, and 7.50-16LT tires NOT AVAILABLE
Hemminger 15 HP electric motor and gear reducer, with (3) 20' bolt-together sections, manual raise, and 7.50-16LT tires NOT AVAILABLE
Hemminger 15 HP electric motor and gear reducer, with (3) 20' bolt-together sections, manual raise, and 7.50-16LT tires NOT AVAILABLE
MGL Hydraulic driven, with feed hopper, hydraulic raise and 7.50-16 tires 39300027

MGL Deutz 4 cylinder diesel engine and 10KW generator with 10 HP electric motor, with manual raise and 7.50-16LT tires 5030210

MGL Hydraulic drive, with hydraulic raise and 7.50-16LT tires 4030251

MGL Deutz 4 cylinder diesel engine, with feed hopper, 48" collecting conveyor, hydraulic raise, 48" suspended crossbelt magnet, and 7.50-16LT tires 4048051

MGL Hydraulic driven, with hydraulic raise and ST235/80R16 tires 3930021

Freightliner Mercedes Benz diesel engine and Eaton Fuller 10 speed transmission with Timberjack model 330D loader, s/n WC33DY011104, with Deere 4 cylinder diesel engine, 15 KW generator, enclosed operators cab, and (4) hydraulic outriggers, 7' steel flatbed, 12,000# front and 40,000# rear axles, air ride suspension, 243" wheelbase, air conditioning, and 11 R22.5 tires 1FUJAC6CV64LM56870

Peterbilt Cat 3406 diesel engine and Eaton Fuller 18 speed transmission with Prentice loader with 4 cylinder diesel engine, 10KW generator, enclosed operators cab, and (4) hydraulic outriggers, 7' steel flatbed, 12,000# front and 40,000# rear axles, air ride suspension, 256" wheelbase, PTO, air conditioning, and 345/80R22.5 front and 285/75R24.5 rear tires 1XP4D29X3GN202134

Thompson Rolloff container with rear swing door, good condition 032836
 Thompson Rolloff container with rear swing door, good condition 031862

Rolloff container located in Auburn, NY N/A
 TFD Rolloff container with rear swing door, very good condition (NEW) N/A

Rolloff container with rear swing door, good condition N/A
 Rolloff container N/A
 Rolloff container N/A

Multiquip Volvo Penta TAD741GE, 281HP diesel engine, with Denyo model DF-2400V AC generator, 220KVA, 240/480-volt, 60 hz, 529/265A, and trailer mounted with LT235/85R16 tires 3756545

- Gunderson High Side Gondola 100 Ton Railcars AGR 119712
- Gunderson High Side Gondola 100 Ton Railcars AGR 119756
- Gunderson High Side Gondola 100 Ton Railcars AGR 119781
- Gunderson High Side Gondola 100 Ton Railcars AGR 119806
- Gunderson High Side Gondola 100 Ton Railcars AGR 119823
- Gunderson High Side Gondola 100 Ton Railcars AGR 119841
- Gunderson High Side Gondola 100 Ton Railcars AGR 119890
- Gunderson High Side Gondola 100 Ton Railcars AGR 119956
- Gunderson High Side Gondola 100 Ton Railcars AGR 119961
- Gunderson High Side Gondola 100 Ton Railcars AGR 174200
- Gunderson High Side Gondola 100 Ton Railcars AGR 174206
- Gunderson High Side Gondola 100 Ton Railcars AGR 174267
- Gunderson High Side Gondola 100 Ton Railcars AGR 174288

ZZ FL Commercial Credit Group Inc 201402693913

Gunderson High Side Gondola 100 Ton Railcars AGR 585568
 Gunderson High Side Gondola 100 Ton Railcars AGR 585575
 Gunderson High Side Gondola 100 Ton Railcars AGR 586026
 Gunderson High Side Gondola 100 Ton Railcars AGR 586155
 Gunderson High Side Gondola 100 Ton Railcars AGR 586202
 Gunderson High Side Gondola 100 Ton Railcars AGR 586254
 John Deere used John Deere model 544J Wheel Loader DW544JZ614970
 John Deere used John Deere model 544J Wheel Loader DW544JZ602347

accounts receivables +

- (1) One 2005 Multiquip DCA220 SSVc Generator 375-6545
- (1) 1994 Freightliner Tri-Axle Chassis with 20' Aluminum Body 1FV7E0Y93RH647690
- (1) One 60-36 Conveyors with 10 HP Motors
- (1) One 60-36 Conveyors with 10 HP Motors
- (1) One 60-36 Conveyors with 10 HP Motors
- (1) One 60-36 Conveyors with 10 HP Motors
- (1) One 60-36 Conveyors with 10 HP Motors
- (3) Three 20-yard containers AS374012, AS374013 & AS374014
- (1) 2000 Ravens Dump Trailer 1R1D04025Y1100013
- (1) 2000 Ravens Dump Trailer 1R1D04028Y1100250
- (1) 2013 Hyundai HSL 850-7A Skid Steer Loader - S70210003 with attached S-30Gapple Bucket/Flip Screen Bucket -S30-0612-0145
- (1) One Flip Screen WL13004130091
- (1) One Flip Screen WL13004130089
- (1) One 2013 MGL EX1 Portable Screen Plant MGLEX1002
- (1) One 2007 Viper 107C Screenshot JB1392
- (1) One 1997 Clark Michigan 55C Wheel Loader 481B306CB
- (1) One 2005 Atlas Copco KW QAS108PD Generator USA102669
- (1) One 2000 New Holland EC215 Material Handler 721543
- (1) One 2007 John Deere 544J Wheel Loader DW544JZ614435
- (4) Four Borco 20 Yard Open Top Containers BOR0106-BOR0109
- (1) One 1998 J&J Dump Trailer 1S92A3532WM006840
- (1) One 1998 J&J Dump Trailer 1S92A3532WM006837
- (1) One 1998 J&J Dump Trailer 1S92A3530WM006836
- (1) One 1995 JB Enterprises Dump Trailer AJ9DT3637SPJ88154
- (1) One 1988 TI Brook Dump Trailer 1T9BSAN34JB021445
- (1) One 2013 MGL EX1 Portable Screen Plant MGLEX1001

One (1) Trailer mounted ECS unit incorporating: 41' road portable trailer with double axel and hydraulic stabilizer legs; feed hopper with 42" conveyor; 42" trio over band magnet and support structure; Eddy Current unit w/with feeder, support structure and enclosure; 36" "non ferrous" double fold discharge conveyor; 42" Overs: folding discharge conveyor; 4048 Crossbelt Magnet feeder; Electric power with diesel/hydraulic power unit for "set up"; Unit treated with epoxy primer and urethane paint
 One (1) Powerscreen Commander Screen Plant: 10 cu. Yard hopper and incline belt' 5'x10' feet screen box; diesel/hydraulic power; 175KW Diesel Powere Generator Set; Unit fitted with a 36" over band magnet and support structure; all auxiliary conveying equipment located with the above

25	FL	Summit Bank, NA	201503004668	2014 Liebherr A904C Crane Serial# 1071-34528
24	FL	Summit Bank, NA	201503081204	2015 Lieherr A904C Crane Serial # 1071-63246
23	FL	John Deere Construction & Forestry Company	201504154450	John Deere 328E Skid Steer Loader S/N: 271933
20	FL	Bank of the West	201504532641	1- 2013 Didlon Model no. LC20 Serial No DM 477-R Unit has a 20ft container with all electrical equipment
18	FL	Summit Bank, NA	201504585508	Rubber Tired Material Handlers; Serial #1071-34628; 1071-63246; 441-28276; 441-22908; 983-18774; 8210953; 82151037; 8215665; 8210921; 82101017; 8210996; 672-6258; 404-623; K4J59659; HZ609CDD0000006 and HZ403PPD0000509;
14	FL	Susquehanna Commercial Finance, Inc	20150461544X	1 Kawasaki Wheel Loader, Model no Z 80. Serial no: 80C45330
15	FL	Susquehanna Commercial Finance, Inc	201504615458	1 Case Dozer, Model no: 1850K Serial no: HH0185050041
16	FL	Susquehanna Commercial Finance, Inc	201504615466	1 Komatsu Excavator with a scrap Grapple. Model no: PC 300. Serial no: LC A 80572
13	FL	Corporation Service Company	201505067195	Lease Agreement # 2163447
12	FL	Reco Equipment, Co	20150572711X	One (1) Liebherr A904 s/n 1071-34628
11	FL	John Deere Construction & Forestry Company	201606644260	John Deere 844K Wheel Loader S/N: 651360
10	FL	John Deere Construction & Forestry Company	20160735391X	John Deere 250D Vehicle S/N: 638313
9	FL	Komatsu Financial Limited Partnership	201607523262	One (1) Komatsu WA380-6 S/N A53354
8	FL	Financial Pacific Leasing, Inc	201607557620	all equipment and other personal property - Lease #39065RY 16 dated 4/20/16

7 FL Financial Pacific Leasing, Inc 20160775616X
 6 FL Leaf Capital Funding, LLC 201608154465
 4 FL Commercial Credit Group Inc 201609766219

Lease #001-1209045-901 from 5/24/16
 Didion 40 ton Press Unit

accounts receivables +

all assets now owned or hereafter acquired

- (1) One 2006 Dodge Service Truck with Gas Welders and Air Compressors 3D6WL46C56G180147
- (1) One 2006 Dodge Service Truck with Gas Welders and Air Compressors 3D7ML46C86G180145
- (1) One 2000 USTS Dump Trailer 1U9FA4224Y1051954
- (1) One 2000 USTS Dump Trailer 1U9FA42271051903
- (1) One 1990 J&J Dump Trailer 1S9ST0240LM006034
- (1) One 1989 Cobra Dump Trailer 1CPFA39B2K2133213
- (1) One 2005 Hydro A-902 Material Handler with new 105kw Generator, new 45" magnet and new lift cylinders A-902-359 5469
- (1) One 2002 Liebherr 914 Material Handler 672-6258
- (1) One 2006 East Trailer 1E1F9U2866RF37444
- (1) One 2001 Mac Lan Trailer 5MATN48231C004598
- (1) One 2002 East Trail 1E1U1Y2842RH31406
- (1) One MGL Handy Screen EX Extended Conveyor HSEX96016C
- (1) One MGL 4048 Conveyor w/3 cu yd Hopper and Trio CRP42 Cross Belt Magnet 4048050
- (1) One MGL 4030 Conveyor w/ Hydraulic Coupling Unit 4030251
- (1) One 2007 John Deere 544J DW544JZ611782
- (1) One 1998 JCB 510-40 Forklift 576854
- (1) One MGL Packaged engineering skid including: Feedhopper with 42" conveyor w/43" trio over band magnet w/support w/42" overs folding band magnet w/support w/36" nonfe product double fold conveyor 576854
- (1) One MGL 3630 Screen Plant
- (1) One MGL fitted with 36" over-band magnet and double-deck wire mesh screen, 2 sets (1 set 3/4" and 1 set 1/2") w/variable speed feeder
- (1) One MGL Eddy current system for nonfe metals global magnetics, inc (ECS125)
- (1) One MGL 55' drop deck 2-axle road trailer with hydraulic stabilizers
- (1) One MGL 20' weather protection enclosure w/roll-up doors and skylights
- (1) One Moley Magnetics ESB 40" Magnet System

- (1) One MGL 5030 Radial Conveyors w/ 2x48" Magnetic Head Pulleys 5030195
- (1) One MGL 5030 Radial Conveyors w/ 2x48" Magnetic Head Pulleys 5030200
- (1) One 2007 Sterling 9500 Day Cab Tractor Truck with 10-speed transmission, air ride ten (10) aluminum wheels, wet line ZFWJA3CV97AY47009
- (1) One 2007 Sterling 9500 Day Cab Tractor Truck with 10-speed transmission, air ride ten (10) aluminum wheels, wet line ZFWJA3CV77AY47011
- (1) One 1998 Extec 3600 Shredder 6TB17531
- (1) One 2005 Multiquip DCA220 SSVC Generator 375-6545
- (1) One 1994 Freightliner Tri-Axle Chassis with 20' Aluminum Body 1FV7F0Y93RH647690
- (1) One 60-36 Conveyors with 10 HP Motors
- (1) One 60-36 Conveyors with 10 HP Motors
- (1) One 60-36 Conveyors with 10 HP Motors
- (1) One 60-36 Conveyors with 10 HP Motors
- (1) One 3-20 Yard Containers AS374012, AS374013 & AS374014
- (1) One 2000 Ravens Dump Trailer 1R1D04025V1100013
- (1) One 2000 Ravens Dump Trailer 1R1D04028Y1100250
- (1) One 2013 Hyundai HSL 850-7A-S-30 Skid Steer Loader (S70210003) with attached Gapple Bucket/Flip Screen Bucket (S30-0612-0145)
- (1) One Flip Screen WL 13004130091
- (1) One Flip Screen WL 13004130089
- (1) One 2013 MGL EX1 Portable Screen Plant MGLEX1002
- (1) One 2007 Viper 107C Screenplant JB1392
- (1) One 1997 Clark Michigan 55C Wheel Loader 481B306CB
- (1) One 2005 Atlas Copco KW QAS108PD Generator USA102669
- (1) One 2000 New Holland EC215 Material Handler 721543
- (1) One 2007 John Deere 544J Wheel Loader DW544JZ614435
- (1) One 4 Borco 20 Yard Open Top Containers BOR0106-BOR0109
- (1) One 1998 J&J Dump Trailer 1S92A3532WMN006840
- (1) One 1998 J&J Dump Trailer 1S92A3532WMN006837
- (1) One 1995 JB Enterprises Dump Trailer A9D73637SPJ88154
- (1) One 2013 MGL EX1 Portable Screenplant MGLEX1001
- (1) One 2007 Sterling Rolloff Truck 2FZHAZCV77AX37824
- (1) One 2005 Sterling Rolloff Truck 2FZHAZCV35AN75588
- (1) One 2008 Eagle Trailer 112SB25078L072916

3 FL Navitas 201700331009 2008 STE TL TRL VIN # SEWDS382081254242
2 FL Navitas 20170061387X Eagle Course Material Washer
1 FL Bank Capital Services LLC 201703302034 T20KW 1010132 8877 034 004 Generating System with Controller,

Generator, MMI, MMI Cable and Joy Stick Cable, Serial #WI 59721
T20KW 1010132 8877 034 004 Generating System with Controller,
Generator, MMI, MMI Cable and Joy Stick Cable, Serial #WI 59722
T20KW 1010132 8877 034 004 Generating System with Controller,
Generator, MMI, MMI Cable and Joy Stick Cable, Serial #WI 59723
T20KW 1010132 8877 034 004 Generating System with Controller,
Generator, MMI, MMI Cable and Joy Stick Cable, Serial #WI 59724

State	Creditor	Number	Collateral	Collateral Value
39 FL	Summit Bank, NA	201300455428	all inventory and accounts receivables +	unknown
40 FL	Summit Bank, NA	201300455886	A Blanket Lien on all Furniture, Fixtures and Equipment	unknown
25 FL	Summit Bank, NA	201503004668	2014 Liebherr A904C Crane Serial# 1071-34528	\$ 150,000.00
24 FL	Summit Bank, NA	201503081204	2015 Lieherr A904C Crane Serial # 1071-63246	\$ 100,000.00
18 FL	Summit Bank, NA	201504585508	Rubber Tired Material Handlers, Serial #1071-34628, 1071-63246; 441-28276; 441-22908; 983-18774; 8210953; 82151037; 8215665; 8210921; 82101017; 8210996; 672-6258; 404-623; K4J59659; HZ609CD0000006 and	unknown
TOTAL				\$ 250,000.00

Exhibit B

