

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

IN RE:	:	
	:	CHAPTER 11
MARBLE MASTERS OF MIDDLE GEORGIA, INC.,	:	
	:	CASE NO. 18-50891-AEC
Debtor	:	
	:	
MARBLE MASTERS OF MIDDLE GEORGIA, INC.,	:	CONTESTED MATTER
	:	
Movant	:	
	:	
v.	:	
	:	
RENASANT BANK, as successor to HeritageBank Of The	:	
SOUTH, CORPORATION SERVICE COMPANY, and	:	
DLI ASSETS BRAVO, LLC, as successor in interest to	:	
QuarterSpot, Inc.,	:	
	:	
Respondents	:	

MOTION FOR PERMISSION TO USE CASH COLLATERAL

COMES NOW Marble Masters of Middle Georgia, Inc. (“Movant”) and in support of its Motion for Permission to Use Cash Collateral respectfully show as follows:

1.

On May 11, 2018, Movant filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

2.

Movant owns and operates a manufacturing business in Warner Robins, Georgia.

3.

Renasant Bank, as successor to HeritageBank of the South (“Renasant”), Corporation Service Company, and DLI Assets Bravo, LLC, as successor in interest to QuarterSpot, Inc.

("Respondents") may claim to hold security interests in accounts receivable and inventory of Movant. Renasant is in first priority according to UCC records filed.

4.

Prior to the filing of the petition for relief herein, Movant was permitted by Respondents to use such revenues from collateral for payment of expenses necessary for the operation of its businesses.

5.

Without the use of such revenues by Movant the value of Movant's property will decrease, because goodwill and going concern value of the business will be diminished or lost. If necessary expenses are not paid, Movant will not be able to make payroll and maintain its business. Payment of these expenses is necessary to ensure the maintenance of future revenues.

6.

Movant proposes to use the revenues of operations to pay operating expenses incurred in the normal course of its business. A proposed expense budget is attached hereto as Exhibit "A".

7.

As adequate protection, Movant proposes to grant Respondents post-petition security interest in post-petition receivables and proceeds to the same extent and priority that they held pre-petition security interest in receivables to the extent of cash collateral used.

8.

To the extent the revenues are cash collateral, Respondents are adequately protected for the use of the funds.

WHEREFORE, Marble Masters of Middle Georgia, Inc. respectfully requests that it be authorized to use proceeds as provided in Exhibit "A", and that it have such other and further relief as is just and proper.

BOYER TERRY LLC

By:



WESLEY J. BOYER

Attorney for Debtor/Movant

State Bar No. 073126

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Cash Flow Budget updated 5/31/2018

Marble Masters of Middle Ga. inc.
May 29- June 29, 2018

Totals

Incomes expected

Current jobs, balances	110,811.00	
New jobs forcast-deposits	50,000.00	
Total incomes		\$160,811.00

Expenses

Payables due, listed	35,830.54	
Monthly recurring & estimated	56,177.00	
Insurances, COD supplies, misc	10,600.00	
Payroll & Taxes	32,000.00	
Rent	7,500.00	
G&L + W/comp ins	4,100.00	
Owners reimbursement/pay	8,000.00	
		\$154,207.54

Difference		\$6,603.46
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CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the

MOTION FOR PERMISSION TO USE CASH COLLATERAL

upon the following:

DLI Assets Bravo, LLC 550 North Brand Boulevard, Suite 2000 Glendale, CA 91203	HeritageBank of the South PO Box 50728 Albany, GA 31703
Renasant Bank (Inc) c/o Ken Davis, Registered Agent 275 S. Main Street Alpharetta, GA 30009	Renasant Bank (Inc) PO Box 709 Tupelo, MS 38802
Corporation Service Company c/o The Prentice-Hall Corporation System, Inc., Registered Agent 40 Technology Parkway South, Suite 300 Norcross, GA 30092	Corporation Service Company 801 Adlai Stevenson Drive Springfield, IL 62703-4261
Office of the United States Trustee 440 MLK, Jr. Blvd., Suite 302 Macon, GA 31201	

by depositing a copy of the same in the United States mail, first class, in a properly addressed envelope with sufficient postage affixed thereto this 31st day of May, 2018.



WESLEY J. BOYER