

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re: }
 } **CHAPTER 11**
ADVANCED ACCESS SECURITY }
TECHNOLOGY, INC., }
 } **CASE NO. 18-**
Debtor. }
 }

DEBTOR'S MOTION TO USE CASH COLLATERAL

COMES NOW Advanced Access Security Technology, Inc., named as Debtor herein, by and through its counsel of record, and brings this, its Motion To Use Cash Collateral as follows:

1.

This case was filed on February 15, 2018 under chapter 11 of chapter 11, United, States Code.

2.

Debtor continues to operate its business and manage its business affairs as Debtor in Possession pursuant to 11 U.S.C. §§1107 and 1108.

3.

Service of this Motion is made pursuant to F.R.B.P. Rule 7004.

4.

Debtor Advanced Access Security Technology, Inc. is an ongoing concern with approximately \$214,386.45 in receivables and regular ongoing income. The same serves as collateral for a loan with BFS Capital, Inc. and is subject to a writ of fieri facias held by David Pearson Communities, Inc., the judgment and lien of which are disputed.

5.

Debtor seeks to use cash collateral for the following purposes:

- a. Payment of employee payroll in the approximate amount of \$5,438.50 per week;
- b. Payment to vendors for materials for pending, ongoing and future projects;
- c. Maintenance and repair of the machinery utilized by Debtor;
- d. Payment to the various utility services for utilities at the business premises;
- e. Pay for insurance policies insuring the business; and

f. Pay for ongoing tax obligations.

6.

Immediate use of the cash collateral is necessary to avoid immediate and irreparable harm to the estate. Debtor's request to use cash collateral is based on sound business reasoning.

7.

Without using the cash collateral to retire its ongoing expenses, including retirement of long-term debt and repairs to property occupied by Debtor, both Debtor and the bankruptcy estate would be irreparably harmed.

WHEREFORE, Debtor prays for relief in the following manner:

- a. That Debtor's motion for permission to use cash collateral be granted; and
- b. That Debtor be granted such other and further relief as the Court deems just, equitable and proper.

This 15th day of February 2018.

Respectfully submitted,
EDWARDS & JOHNSON, LLC

/S/

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CERTIFICATE OF SERVICE

I hereby certify that on this day, I served the following party by depositing copies of "DEBTOR'S MOTION TO USE CASH COLLATERAL" in the U. S. Mail with adequate first class postage affixed thereto for delivery to:

Office of the US Trustee
Suite 362
75 Spring Street, SW
Atlanta, GA 30303

BFS Capital, Inc.
3301 N. University Drive
#300
Coral Springs, FL 33065

David Pearson Communities, Inc.
2000 1st Drive
Marietta, GA 30062

Fred D. Bentley, Esq.
Bentley, Bentley & Bentley
241 Washington Ave.
Marietta, GA 30060

This 15th day of February 2018.

Respectfully submitted,
EDWARDS & JOHNSON, LLC

/S/

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Georgia Bar No. 095624
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