

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE:	)	
Wheelchair Sales & Services, Inc.	)	Bankruptcy No. 18 B 05186
	)	Chapter 11
	)	
Debtors	)	Judge Donald R. Cassling
	)	
	)	

To: See Attached List

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that on **March 6, 2018**, at the hour of 9:30 A.M., or as soon thereafter as counsel may be heard, I shall appear before the honorable Donald R. Cassling in Courtroom 619 of the United States Bankruptcy Court, 219 S. Dearborn St., Chicago, Illinois, or any other judge sitting in his place and stead, and shall then and there present the attached **Motion to Authorize Debtor’s Use of Cash Collateral**, a copy of which is hereby served upon you. You may appear if you so choose.

David P. Lloyd, Ltd.  
615B S. LaGrange Rd.  
LaGrange IL 60525  
708-937-1264  
Fax: 708-937-1265

**CERTIFICATE OF SERVICE**

I, David P. Lloyd, an attorney, certify that I caused a copy of the foregoing Notice and Motion to be served on the parties listed on the attached service list by electronic notice where indicated by the insertion of the party’s electronic address, or by first class mail by depositing with the United States Post Office, LaGrange, Illinois, prior to 5:00 P.M., this 1st day of March, 2018.

\_\_\_\_\_/s/ David P. Lloyd\_\_\_\_\_  
David P. Lloyd

**Wheelchair Sales & Services, Inc.**  
**18 B 05186**  
**Service List**

Office of the United States Trustee  
USTPRegion11.ES.ECF@usdoj.gov

McKesson Corporation  
c/o Kevin Posen  
kposen@tellerlevit.com

Sunrise Medical (US) LLC  
c/o Craig W. Relman  
crelman@aol.com

Wheelchair Services, Inc.  
Service List  
Case 18-05186

Wheelchair Sales & Services, Inc.  
14001 W. Illinois Highway  
New Lenox, IL 60451-3282

U.S. Bankruptcy Court  
Eastern Division  
219 S Dearborn  
7th Floor  
Chicago, IL 60604-1702

Altimate Medical  
PO Box 678416  
Dallas, TX 75267-8416

Cocalas, Westerberg, Mommsen  
60 Orland Square Drive  
Orland Park, IL 60462-3282

Independence Medical  
PO Box 635864  
Cincinnati, OH 45263-5864

Kevin Link  
1440 virginia St.  
Downers Grove, IL 60515-1814

Maurice Valeriano  
7332 East Ed Rice Avenue  
Mesa, AZ 85208-2715

McKesson Corporation  
One Post Street  
San Francisco, CA 94104-5284

Providence Home Medical LP  
451 Valley Brook Rd., Ste. 204  
Canonsburg, PA 15317-3375

Sunrise Medical  
PO Box 933056  
Atlanta, GA 31193-3056

Sunrise Medical  
c/o Latimer Levay Fyock, LLC  
55 W. Monroe St., Ste. 1100  
Chicago, IL 60603-5128

The Med Group  
PO Box 931830  
Atlanta, GA 31193-1830

William M. Downs  
14415 S. Provencal Dr.  
Homer Glen, IL 60491-7561

David P Lloyd  
David P. Lloyd, Ltd.  
615B S. LaGrange Rd.  
LaGrange, IL 60525-6864

Patrick S Layng  
Office of the U.S. Trustee, Region 11  
219 S Dearborn St  
Room 873  
Chicago, IL 60604-2027

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IN RE:	)	
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Debtors	)	Judge Donald R. Cassling
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	)	

**MOTION TO AUTHORIZE DEBTOR'S USE OF CASH COLLATERAL**

NOW COMES the Debtor, Wheelchair Sales & Services, Inc., by and through its attorney, David P. Lloyd, and moves this honorable Court for authority to use cash collateral of its creditor, McKesson Corporation, and in support thereof states as follows:

1. Movant commenced this case by filing a voluntary Chapter 11 petition on February 26, 2018.
2. The Debtor is an Illinois corporation that sells and services medical and rehabilitation equipment.
3. Among the creditors of the Debtor is McKesson Corporation, which holds a lien on substantially all of the Debtor's assets, which are limited to personal property, including machinery & equipment, inventory, and accounts receivable.
4. The proceeds of the operations of the Debtor, including the sale of inventory, constitute cash collateral under the Bankruptcy Code.
5. The Debtor requires the use of cash collateral to pay utilities, salaries, wages, rent, credit card processing, and other operating expenses, and to purchase new inventory.
6. The balance due and owing to McKesson Corporation is approximately \$862,000. The Debtor believes that the machinery & equipment, inventory, and accounts receivable have a

combined value, net of uncollectable account, of approximately \$350,000, and that McKesson Corporation is not fully secured.

7. In addition to the lien of McKesson Corporation, the Debtor is informed and believes that Sunrise Medical (US) LLC claims a lien on its assets, with an amount due of approximately \$125,000. The Debtor believes that this lien is not perfected, as the perfection lapsed in 2014, five years after the last filed financing statement.

8. The Debtor proposes to make an adequate protection payment of \$1,500.00/month to McKesson Corporation. This number represents an amount approximately equal to 5% interest, per annum, on the secured amount of the McKesson Corporation claim. Attached hereto is a budget of income and expenses for the Debtor's operations in the coming month. In addition, the Debtor proposes to grant McKesson Corporation a replacement lien on all newly-acquired assets of the type on which McKesson Corporation currently holds a lien.

9. The Debtor does not intend to waive any claim as to the valuation of the collateral, nor to determine the proper application of adequate protection payments to principal or interest by the filing of this motion or the entry of a cash collateral order. **None of the provisions of Local Rule 4001-2 (a-j) are incorporated in this application for use of cash collateral.**

10. The Debtor believes, in view of the collateral value, that the granting of a post-petition replacement lien in favor of McKesson Corporation, together with monthly payments as proposed herein, as well as other non-monetary protection such as insurance coverage, is sufficient adequate protection to allow for the continued use of cash collateral under 11 U.S.C. §361(1) and (2).

11. The Debtor has provided notice to all creditors and parties in interest. Because the Debtor needs to use cash collateral to pay the expenses of operating its business on a daily basis, the Debtor prays that notice actually given of this motion be deemed sufficient.

WHEREFORE Wheelchair Sales & Services, Inc., prays that the Court enter an order authorizing the use of cash collateral by the Debtor through April, 2018, that the Court set a date for further hearing on the Debtor's motion, and that the Court deem notice actually given to be adequate.

Respectfully submitted,  
Wheelchair Sales & Services, Inc.

By: /s/ David P. Lloyd  
Its attorney

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