

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

IN RE: A HELPING HAND TOO, LLC

CASE NO. 17-31512
CHAPTER 11

MOTION FOR USE OF CASH COLLATERAL
NOTICE OF HEARING AND RESPONSE DEADLINE

NOW INTO COURT, through undersigned counsel, comes the above captioned debtor, A Helping Hand Too, LLC, who respectfully requests that this court grant consideration of the Debtor's Motion For Use of Cash Collateral (more specifically, levied receivables that were returned to the business by the IRS) for the following reason(s):

1.

Contemporaneously with this motion, the debtor filed its Motion for Use Of Cash Collateral Notice of Hearing and Response Deadline. That motion is currently set on 21 days negative notice pursuant to this Court's Standing Order and is currently set for hearing before this Court on December 7, 2017 at 9:30 a.m. If you do not want the court to grant the relief sought in the Motion for Use of Collateral Cash, then **ON OR BEFORE SEVEN DAYS FROM THE HEARING DATE SET FORTH FOR THE MOTION FOR USE OF CASH COLLATERAL**, you must file with the court a written response explaining your position by mailing your response by regular U. S. Mail to United States Bankruptcy Courthouse, Bankruptcy Courtroom, 201 Jackson Street, Monroe, LA 71201 or your attorney must file a response using the court's ECF system. **IF YOU OR YOUR ATTORNEY DO NOT TAKE THESE STEPS, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION FOR USE OF CASH COLLATERAL AND MAY ENTER AN ORDER GRANTING THAT RELIEF WITHOUT FURTHER HEARING OR NOTICE.**

2.

This Court has jurisdiction over the matters presented herein, which are core in nature, pursuant to 28 USC §157(b)(2)(M) and (O).

3.

Debtor filed for Chapter 11 bankruptcy relief on September 12, 2017. Debtors receivables which were to be used for payroll were levied on September 14, 2017, and

the Department of Health & Hospitals mailed the funds to the Internal Revenue Service. On the same date, the Internal Revenue Service mailed a Release of Levy to Department of Health & Hospitals. Once the checks from DHH were received by the Monroe IRS office, the checks were sent back to DHH Financial Management. The levied checks were eventually reissued to A Helping Hand Too, LLC and mailed to their office.

4.

Debtor has received the levied funds and desires to utilize the funds to pay their employees, which is what would have been done if they had not been levied.

5.

Debtor moves that they be authorized to use the funds returned by the IRS and DHH to make payroll for their employees. This debtor requests that the Court either grant expedited consideration of the Motion for Use of Cash Collateral, or enter an interim order approving cash collateral use during the 21 day waiting period.

WHEREFORE, DEBTOR IN POSSESSION PRAYS that this Court grant the use of cash collateral as outlined above.

Respectfully submitted, this 1st day of November, 2017, Monroe, Louisiana.

/s/ Louis G. Scott
Louis G. Scott #11882
Attorney At Law
510 Pine Street
Monroe, LA 71201
(318) 325-6107

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

In Re:
A HELPING HAND TOO, LLC
Debtor

CHAPTER 11
CASE NO. 17-31512

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Compensate Employees has been sent to Mr. Philip L. Reiland, Jr., Supervisory Auditor, U.S. Department of Justice, Office of the United States Trustee, Region 5, 300 Fannin Street, Suite 3196, Shreveport, LA 71101 via facsimile (318) 676-3212; Internal Revenue Service, 1401 Hudson Lane, Monroe, LA 71201, via U. S. Mail; ACE Cash Express, 1231 Greenway Drive, Suite 600, Irving, TX 75038, via U. S. Mail; Knight Capital Funding, 9 E. Lockerman Street, Suite 3A-543, Dover, DE 19901, via U. S. Mail; U. S. Department of Labor, 525 S. Griffin Street, Suite 800, Dallas, TX 75202, via U. S. Mail; and Kenneth Henderson, 55 Northgate Drive, Monroe, LA 71201, via U. S. Mail, on this 15th day of November, 2017.

/s/ Louis G. Scott
LOUIS G. SCOTT