

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

In re:

FYNDERS, INC.,

Debtor.

Chapter 11

Case No. \_\_\_\_\_

**DEBTOR’S MOTION FOR AUTHORITY TO USE CASH COLLATERAL**  
**[Expedited Determination On or Before March 9 Requested]**

Debtor Fynders, Inc. (“Fynders”), by and through its proposed counsel, Madoff & Khoury LLP, hereby moves this Court for entry of an order pursuant to Sections 361 and 363(c)(2) of the Bankruptcy Code, and MLBR 4001-2, authorizing the use of the cash collateral of secured creditor Rockland Trust Company (“RTC”), the Internal Revenue Service (“IRS”) and the Massachusetts Department of Revenue (“DOR”). **As set forth below, Fynders will need to pay certain ongoing expenses, including wages, on March 10. Accordingly, Fynders requests, pursuant to MLBR 9013-1(g), expedited determination of this Motion by March 9, 2016.**<sup>1</sup> In support of this Motion, Fynders respectfully represents:

**I. Introduction**

1. On March 7, 2016 (the "Petition Date"), Fynders filed a voluntary petition under Chapter 11 of the Bankruptcy Code in this Court.

<sup>1</sup> Counsel for the Debtor, a Chapter 7 trustee, has a scheduled rotation on August 24.

06/07/2017 NO OBJECTIONS HAVING BEEN FILED AND GOOD CAUSE APPEARING THEREFOR, THE CONTINUED USE OF CASH COLLATERAL IS HEREBY GRANTED AND THE HEARING SCHEDULED FOR JUNE 8, 2017 IS CANCELLED. A SEPARATE ORDER SHALL ENTER.