

UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF MASSACHUSETTS

In re:
LAURA ELSHEIMER LLC

Debtor

Chapter 11
Case No. 17-41842-CJP

DEBTOR'S EXPEDITED MOTION FOR AUTHORIZING OF (1) USE OF CASH COLLATERAL, (2) GRANTING REPLACEMENT LIENS AS ADEQUATE PROTECTION, AND (3) ADDITIONAL RELIEF

LAURA ELSHEIMER LLC (“Debtor”) hereby moves this Court of entry of interim and final orders authorizing the Debtor to use Cash Collateral through under the terms set forth in this Motion. The Debtor requests that the entry of an order:

- (a) Entry of an order authorizing the interim use of Cash Collateral in the ordinary course of business;
- (b) Authority to grant post-petition liens to the lienholder (as described herein) as adequate protection to the extent described in this Motion;
- (c) Scheduling a final hearing on this Motion for entry of interim and final orders regarding the continued use of Cash Collateral.

BACKGROUND

1. On October 12, 2017 (the “Petition Date”) the Debtor commenced this proceeding by filing a voluntary petition for relief pursuant to Chapter 11 of the Bankruptcy Code (the “Code”). The Debtor filed a prior case Chapter 11 which was converted to Chapter 7. The Debtor filed this action to stay a foreclosure. Unlike the Debtor's strategy to retain the estate property, the Debtor now desires to sell

11/01/2017 NO OBJECTIONS HAVING BEEN FILED, FURTHER USE OF CASH COLLATERAL IS AUTHORIZED THROUGH JANUARY 31, 2018 AND THE HEARING SCHEDULED FOR NOVEMBER 2, 2017 IS CANCELLED. A SEPARATE ORDER SHALL ENTER. COUNSEL SHALL FILE AND SERVE NOTICE OF A PROPOSED FORM OF ORDER AND REDLINE IN ACCORDANCE WITH PARAGRAPH 9 OF THE INTERIM ORDER ON OR BEFORE NOVEMBER 2, 2017 AT 12:00 P.M.