

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

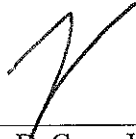
<p>IN RE:</p> <p>LAKEWOOD AT GEORGIA AVE. LLC,</p> <p style="text-align:center">Debtor</p>	<p>Case No.: 16-26171-TJC</p> <p>Chapter 11</p>
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**CONSENT MOTION FOR AMENDMENT AND EXTENSION OF INTERIM ORDER
AUTHORIZING USE OF CASH COLLATERAL**

Lakewood at Georgia Ave. LLC (the “Debtor”) and GCCFC 2007-GG9 Georgia Avenue, LLC (the “Lender”), by and through their respective undersigned counsel, hereby respectfully request that the Court enter an order amending the Interim Order Authorizing Use of Cash Collateral (the “Cash Collateral Order”), [Docket No. 61], to provide (1) that, upon the Debtor’s failure to timely make any Adequate Protection Payments (as defined in the Cash Collateral Order), all stays and injunctions of the above-captioned bankruptcy case, including the automatic stay of 11 U.S.C. § 362(a) shall terminate automatically without the need for any further action by Lender or order of the Court, and Lender shall be entitled to immediately exercise any and all rights against the Property and under the Loan Documents, including, but not limited to foreclosure; and (2) that the Debtor’s use of the Cash Collateral pursuant to the Cash Collateral Order shall remain in effect until the earlier of (a) December 4, 2017; (b) further agreement of the parties; (c) the entry of a further Order upon the use of Cash Collateral; (d) confirmation of a Chapter 11 plan in this case; (e) the conversion of this case to a case under Chapter 7 of the Bankruptcy Code; (f) the dismissal of this case; (g) termination as a result of the occurrence of a Termination Event, as provided in the Cash Collateral Order; or (h) the Debtor’s failure to timely make any Adequate Protection Payments.

A proposed form of order is attached hereto.

Respectfully submitted this 15th day of September, 2017.



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Avenue, LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September __, 2017, I served a true and correct copy of the foregoing Consent Motion for Amendment and Extension of Interim Order Authorizing Use of Cash Collateral by ECF notification upon:

- John David Folds at dfolds@bakerdonelson.com, sparson@bakerdonelson.com
- Marla L. Howell at mhowell@decarohowell.com, mlhowel@juno.com
- Lynn A. Kohen at lynn.a.kohen@usdoj.gov

and by first-class, postage prepaid, to:

Agular & Associates
11510 Georgia Ave
Silver Spring, MD 20902

Bond Water Technologies
630 E. Diamond Ave. Suite jk
Gaithersburg, MD 20877

CBRE
Attn: Ben Powell
Suite 820E
7501 Wisconsin Ave
Bethesda, MD 20814

Chesapeake Sprinkler
1913-B Beston Ct
Odenton, MD 21113

Complete Building Services
2101 Wisconsin Ave
Washington, DC 20007

Datawatch
Suite 500
441 East West Hwy
Bethesda, MD 20814

Edgemoor Contracting Corp
40862 Robin Cir.
Leesburg, VA 20175

Environmental Turf
Suite 227
11510 Georgia Ave.
Silver Spring, MD 20902

Furey, Doolan & Abell LLP
Suite 600
7600 Wisconsin Ave
Bethesda, MD 20814

George Christopher
Suite 600
11 N. Washington St
Rockville, MD 20850

Internal Revenue Service Centralized
Insolvency Unit
PO Box 7346
Philadelphia, PA 19101

JV Accounting Services
Suite 235
11510 Georgia Ave
Silver Spring, MD 20902

Luis Gomez
Suite 110
11510 Georgia Ave
Silver Spring, MD 20902
Martin Lawn & Landscaping
10125 Tenbrook Dr
Silver Spring, MD 20901

Marinari
Suite 190
11510 Georgia Ave.
Silver Spring, MD 20902
Mary Kay
Suite 140
11510 Georgia Ave
Silver Spring, MD 20902

Pray and Adams
Suite 225
11510 Georgia Ave
Silver Spring, MD 20902

Scheer Partners
15245 Shady Grove Rd
Suite 201
Rockville, MD 20850

Thyssen Krupp
9001 - 55th Place
College Park, MD 20740

Triple S Services
2204 Distribution Cir
Silver Spring, MD 20910

Verizon
PO Box 10154
Albany, NY 12212

Washington Hospital Center
Suite 206
11510 Georgia Ave
Silver Spring, MD 20902

Waste Management
4900 Beach Pl
Temple Hills, MD 20748

US Trustee-Greenbelt
6305 Ivy Lane, Suite 600
Greenbelt, MD 20770
US Attorney-District of MD
4th Floor
6 S. Charles St.
Baltimore, MD 21201

Taxing Authority of Montgomery County
Division of Treasury
355 Rockville Pike, Ste.
Rockville, MD 20850

State of Maryland DLLR
Division of Unemployment Insurance
1100 N. Eutaw Street, Room 401
Baltimore, MD 21201

Secretary of the Treasury
15th and Pennsylvania Ave, N.W.
Washington, DC 20220

Comptroller of the Treasury
Compliance Division, Room 409
301 W. Preston Street
Baltimore, MD 21201

U.S. Securities and Exchange Commission
Atlanta Reg Office and Reorg
250 E Paces Ferry Rd NE Ste 900
Atlanta, GA 30326

Branch of Reorganization
Sec. & Exch. Commission
1475 Lenox Rd NE (Suite 1000)
Atlanta, GA 30327

Internal Revenue Service
Centralized Insolvency Section
P.O. Box 211126
Philadelphia, PA 19114

Yang & Ullman
Suite 150
11510 Georgia Ave
Silver Spring, MD 20902



Thomas F. DeCaro, Jr.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)

<p>IN RE: LAKEWOOD AT GEORGIA AVE. LLC, Debtor</p>	<p>Case No.: 16-26171-TJC Chapter 11</p>
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**ORDER GRANTING CONSENT MOTION FOR AMENDMENT AND EXTENSION OF
INTERIM ORDER AUTHORIZING USE OF CASH COLLATERAL**

Upon consideration of the Consent Motion for Amendment and Extension of Interim Order Authorizing Use of Cash Collateral and good cause appearing therefor, it is hereby:

ORDERED, that the Interim Order Authorizing Use of Cash Collateral (the "Cash Collateral Order"), [Docket No. 61], is amended to provide that, upon the Debtor's failure to timely make any Adequate Protection Payments (as defined in the Cash Collateral Order), all stays and injunctions of the above-captioned bankruptcy case, including the automatic stay of 11 U.S.C. § 362(a) shall terminate automatically without the need for any further action by Lender or order of the Court, and Lender shall be entitled to immediately exercise any and all rights against the Property and under the Loan Documents, including, but not limited to foreclosure.

IT IS FURTHER ORDERED, that the Debtor's use of the Cash Collateral pursuant to the Cash Collateral Order shall remain in effect until the earlier of (a) December 4, 2017; (b)

further agreement of the parties; (c) the entry of a further Order upon the use of Cash Collateral; (d) confirmation of a Chapter 11 plan in this case; (e) the conversion of this case to a case under Chapter 7 of the Bankruptcy Code; (f) the dismissal of this case; (g) termination as a result of the occurrence of a Termination Event, as provided in the Cash Collateral Order; or (h) the Debtor's failure to timely make any Adequate Protection Payments.

NOTICE ORDER

IT IS FURTHER ORDERED that the Debtor shall server a copy of this Order and Notice by first class mail within one (1) business day from the date hereof, on (1) the United States Trustee, (2) the District Director of the Internal Revenue Service, (3) the Maryland Comptroller of Taxation, (4) all known secured creditors, and (5) counsel to any committee appointed under Section 1102 of the United States Bankruptcy Code, if one has been appointed and if no such committee has been appointed, to Debtor's twenty largest Rule 1007(d) unsecured creditors. Debtor shall immediately file a certificate of service of said mailing.

[END OF ORDER]