

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
READING DIVISION**

IN RE: R.K. Keystone Mobile Mart, Inc. : Case no. 4:17-14318-REF  
: CHAPTER 11  
Debtor :

***EMERGENCY MOTION TO EXTEND USE OF CASH COLLATERAL***

NOW COMES, the debtor, R.K. Keystone Mobile Mart, Inc., and moves the Court pursuant to the 11 U.S.C. § 363(c)(2) to enter an order permitting the use of cash collateral as defined in 11 U.S.C. § 363(a) which Bancorp Bank and the Bankrupt Estate have an interest and avers:

1. The debtor filed a petition for relief under Chapter 11 of the bankruptcy code on or about June 23, 2017.
2. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. §1334; 11 U.S.C. § 363(c) (2) and the Federal Rules of Bankruptcy Procedure. No. 4001(b).
3. The bankruptcy estate has an interest in the Building(s) at 1452 West Tilghman Street, Allentown, PA 18102-2115 in favor of the debtor and the realty, rent roll, inventory and equipment (hereinafter “cash collateral”) which is subject to the Creditor’s security interest in the approximate amount of \$1,300,000.00.
4. Creditor has not agreed to debtor’s proposed use of Cash Collateral.
5. Debtor proposes to use the cash collateral in the amount of Thirty Thousand (\$30,000.00) per week to purchase inventory, equipment, repairs and to pay vendors and employees.
6. Debtor is informed and believes that there is no alternative other than the use of cash collateral and that such use is necessary to avoid irreparable harm to the debtor’s rehabilitation under the Bankruptcy Code.
7. Debtor proposes to provide adequate protection of the creditor’s interest by granting a perfected replacement security interest under 11 U.S.C. §361(2) of the Bankruptcy Code to the extent that the secured creditor’s cash collateral is used by debtor, to the extent and with the same priority in the debtor’s post-petition collateral and proceeds thereof that secured creditor held in debtor’s pre-petition collateral.
8. On or about July 11, 2017, the Court entered an Interim Order to Use Cash Collateral.

9. Debtor proposes to retain a Turnaround Management Advisor named Log Zero Financial to assist debtor in creation, from contemporaneously prepared daily financial tapes, of records in a general accepted accounting format to enable debtor to deal with debtor's secured creditor in reaching an amount for adequate protection payments to be approved by the Court in order to enable Debtor to determine how to proceed in the Chapter 11 case.
10. Upon creation of such financial information from the original entry records, debtor believes that debtor will be able to determine whether to negotiate a Chapter 11 plan for continued operations or whether to seek authority to sell assets under 11 U.S.C. sec. 363 to be able to propose a liquidating plan. Such proposal will be determined taking into consideration the best interests of the debtor and its creditors.
11. On July 15, 2017, Gurmeet Singh of debtor met with Joseph Hunsberger (hereafter Hunsberger) of Log Zero Financial at debtor's premises. At that meeting, Hunsberger, determined that, while sufficient documentation appeared to exist to prepare records which would allow creation of a workable cash flow projection, at least 40 hours of time to organize and review documentation. Hunsberger, after discussion with Singh, has determined that Singh either lacks the ability to organize the documents properly or is otherwise unable to assist in the presentation of such information for review.

WHEREFORE, the debtor respectfully requests that after notice and opportunity to be heard, the Court enter an ORDER pursuant to 11 U.S.C. § 363(c)(2) permitting Debtor to use Cash Collateral and for such other relief as is just and appropriate.

DATE: July 17, 2017

/s/ Michael J. McCrystal, Esquire

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