

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RE: VAN'S LAUNDROMATS, LLC : BK. NO.: 18 – 15955 – mdc  
: :  
: Chapter 11

**EXPEDITED MOTION OF THE DEBTOR FOR PERMISSION TO USE THE CASH  
COLLATER OF SECURED CREDITORS**

The above named Debtor alleges as follows in support of its Expedited Motion to use the cash collateral of the Debtor's creditors who have an interest in same, namely Eastern Funding (Eastern), Midnight Advance (Midnight), LG Funding (LG) and Yellowstone Capital, LLC (Yellowstone) pursuant to 11 U.S.C. § 363(c) which are believed to be the only parties which hold valid security interests in the Debtor's cash collateral:

1. The Debtor is a corporation that has engaged in the business of operating coin operation Laundromats in five locations in Philadelphia, Pa.
2. The Debtor, on September 9, 2018, filed a Chapter 11 bankruptcy in the Eastern District of Pennsylvania because its receipts from its customers and services were insufficient to make payments on loans which otherwise allowed automatic withdrawals from its bank account(s).
3. The Debtor believes that the only parties that have valid security interests in its cash collateral are Eastern, Midnight, LG and Yellowstone.
4. Debtor is presently unable to pay the amounts due on its loans and continues to serve customers and Debtor would be forced out of business if forced to pay these loans right now.

5. The only prospects of the Debtor to remain able to operate its business and thereafter resume if full payments to its creditors and pay off its creditors requires that the Debtor receive a respite in payments which will allow it to remain in business.
6. The Debtor is preparing a budget of its operations for to be presented to the Court at the time of the hearing here on.
7. Ultimately, Debtor will seek to sell the business, or the real estate and personal property it owns to satisfy its obligations in full.
8. Debtor requires time to market its business and/or real estate and personal property.

WHEREFORE, the Debtor requests that this Motion be granted per the attached proposed Order.

Respectfully Submitted:

Date: October 11, 2018

/s/ Demetrius J. Parrish, Jr.  
Demetrius J. Parrish, Jr., Esquire  
Attorney for Debtor  
7715 Crittenden Street, #360  
Philadelphia, pa. 19118  
(215) 735 - 3377/(215) 827 - 5420 fax  
Email: djpesq@gmail.com