

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

IN RE: : Case No. 5:17-bk-04763-RNO
VOLUME DRIVE INC.. :
: CHAPTER 11
Debtor :

**DEBTOR'S "MOTION FOR APPROVAL FOR
DEBTOR TO UTILIZE CASH COLLATERAL"**

The Motion of Volume Drive Inc. ("Debtor"), by and through its attorney, Edward J. Kaushas, for Approval for Debtor to Utilize Cash Collateral as follows:

1. On November 17, 2017, Debtor filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code (the "Code"). As a result, Debtor has been appointed as a Debtor-in-Possession and operates its business and manages its assets.

2. The Debtor is a Pennsylvania corporation engaged in providing cloud storage services to its customers throughout the United States (the "Business").

3. The term Cash Collateral shall mean cash, negotiable instruments, documents of title, securities, deposit accounts, or other cash equivalents of the Debtor as defined in Section 363 of the Bankruptcy Code

4. Debtor does not believe any Creditor has a lien upon the Debtor's cash, cash equivalents, and/or accounts receivables.

5. As a result, Debtor is filing this Motion out of an abundance of caution.

THE NEED FOR CASH

6. The Debtor requires cash to continue operations.

7. The Debtor has additional cash needs for the payment of utilities, insurance, and other operating expenses.

8. Debtor will incur additional expenses as a result of the Chapter 11 filing, including additional payments for professionals and for Quarterly Fees owed to the Office of the U.S. Trustee.

9. Debtor believes it can operate on a break-even basis.

10. Debtor believes that it will be able to effectively reorganize.

11. Unless the Debtor is allowed to pay its expenses and continue its operations, great harm will occur to the Debtor and to its estate as well as to the Debtor's creditors. It is believed that a reorganization would prove to be better for the Debtor's estate and creditors than a liquidation.

WHEREFORE, Volume Drive Inc., Debtor, respectfully requests that this Honorable Court enter an Order:

- a. Allowing Debtor to utilize its cash, accounts receivable, and cash equivalents.
- b. Granting the Debtor such other and further relief as is just and proper.

Respectfully submitted:

KAUSHAS LAW

By: /s/ Edward J. Kaushas ESQ/CPA
Edward J. Kaushas ESQ/CPA

Date: November 20, 2017