

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	)	
	)	
GERARD BOEH FLOWERS, INC.,	)	Bankr. No. 17-22621GLT
	)	
Debtor	)	Chapter 11
	)	
GERARD BOEH FLOWERS, INC.,	)	Document no.
	)	
Movant,	)	
	)	
v.	)	
	)	
THE HUNTINGTON NATIONAL BANK,	)	
	)	
Respondent	)	

**DEBTOR’S MOTION FOR FINAL AGREED ORDER  
AUTHORIZING DEBTOR’S USE OF CASH COLLATERAL  
AND GRANTING ADEQUATE PROTECTION TO EXISTING LIENHOLDER**

Gerard Boeh Flowers, Inc. by its counsel, Stanley A. Kirshenbaum, moves for authorization of the Debtor's use of cash collateral and for adequate protection of the existing lienholder and in support of this Motion represents the following:

1. The Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code on June 27, 2017.

2. The Huntington National Bank ("Huntington") is the Debtor's senior secured lender. As set forth in more detail in the proposed attached Order, Huntington maintains a lien on all of the Debtor's property and assets including all cash and cash collateral (the "Cash Collateral"). Without consensual use of the Cash Collateral, or approval of the use of Cash Collateral over the objection of Huntington, the Debtor cannot operate its business and the Debtor must cease its operations.

3. Counsel for the Huntington and the Debtor have negotiated the terms of an acceptable Cash Collateral Order. The terms and conditions of that Cash Collateral Order are attached hereto in the Stipulated Order Approving Debtor's Use of Cash Collateral.

WHEREFORE, the Debtor prays for an Order of Court authorizing the Debtor's use of Cash Collateral consistent with the terms of proposed Order.

Respectfully submitted,

/s/ Stanley A. Kirshenbaum  
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