

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

In re:)	
)	Case No. 17-02648 EAG 11
HOGAR CARINO INC.)	
)	
)	Chapter 11
)	
Debtor.)	

MOTION TO PROHIBIT USE OF CASH COLLATERAL

The United States, in place of its agency, the Internal Revenue Service, hereby moves the Court to enter an order prohibiting the Debtor’s use of cash collateral pursuant to 11 U.S.C. § 363(e) and Fed. R. Bankr. P. 4001(a). Alternatively, the United States requests that the Court grant the United States adequate protection in exchange for Debtor’s use of cash collateral.

Pursuant to LBR 9013-2(a), a supporting memorandum and proposed order are filed with this motion.

NOTICE REGARDING RESPONSE TIME

Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk’s office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed here, the paper will be deemed unopposed and may be granted unless (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

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// (Continued)

Dated: September 1, 2017

DAVID A. HUBBERT
Acting Assistant Attorney General

ROSA E. RODRIGUEZ-VELEZ
United States Attorney

/s/ Sean P. O'Donnell
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CERTIFICATE OF SERVICE

I certify that on September 1, 2017, I filed the foregoing *Motion To Prohibit Use Of Cash Collateral* with the Clerk of Court, using the CM/ECF system, which shall serve notice of this filing on all who are registered to receive such notice. I also served the foregoing via U.S. Mail to the following:

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/s/ Sean P. O'Donnell
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