

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND**

In re: Gilded Age Properties, LLC
Debtor-In-Possession

Bk No: 1:17-bk-10738
Chapter 11

MOTION FOR ORDER APPROVING USE OF CASH COLLATERAL

Gilded Age Properties, LLC (“Debtor-In-Possession” or “Debtor”) hereby moves this Court for entry of an order, pursuant to 11 U.S.C. §§ 363 and 364; Federal Rules of Bankruptcy Procedure 2002, 4001, 9014; Local Bankruptcy Rules 4001-2 and 9013-2. The Debtor seeks authorization to use the cash collateral of Webster Bank, N.A. or (the “Secured Creditor”), for thirty (30) days and to provide adequate protection of the Secured Creditor’s collateral position to the extent as proposed and as more fully set forth in the attached proposed Interim Order.

In support of this motion, the Debtor submits the accompanying Memorandum of Law.

WHEREFORE, the Debtor requests entry of an order, consistent with the attached proposed order, allowing the use of the Secured Creditor’s cash collateral for thirty (30) days in order to continue the operation of the Debtor’s business.

Respectfully Submitted,

/s/ Gregory P. Sorbello
Gregory P. Sorbello, Esquire #6564
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Newport, RI 02840
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Within seven (7) days after service, if served electronically, as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if served by mail or other excepted means specified, any party against whom such paper has been served, or any other party who objects to the relief sought, shall serve and file an objection or other appropriate response to said paper with the Bankruptcy Court Clerk's Office, 380 Westminster Street, 6th Floor, Providence, RI 02903, (401) 626-3100. If no objection or other response is timely filed, the paper will be deemed unopposed and will be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2017 I electronically filed Motion for Interim Order Approving Use of Cash Collateral and Setting Procedures for Notice and Hearing with the Clerk of the Bankruptcy Court for the District of Rhode Island using the CM/ECF System. The following participants have received notice electronically:

Gary L. Donahue
ustpreion01.pr.ecf@usdoj.gov

Jennifer V. Doran on behalf of Creditor Webster Bank, N.A.
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Sandra Nicholls on behalf of Assistant U.S. Trustee Gary L. Donahue
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Adam M. Ramos on behalf of Creditor Webster Bank, N.A.
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Andrew Tugan on behalf of Creditor Webster Bank, N.A.
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I hereby certify that on June 6, 2017 I have mailed by United States Postal Service, postage pre-paid, the Motion for Order Approving Use of Cash Collateral and Notice of Hearing and a copy of the Notice of Electronic Filing to the attached list of non CM/ECF participants:

Internal Revenue Service Insolvency Unit
4th Floor
380 Westminster Street
Providence, RI 02903

RI Division of Taxation
Bankruptcy Unit
co Richard P. Smith
Chief - Collection Section
One Capitol Hill
Providence, RI 02903

State of RI - Labor and Training
Legal Department
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Alliance Restoration/C&M LLC
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City of Newport
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Cox Communications
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Credit One Bank
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City of Industry, CA 91716-0500

Crew Remodeling
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Discover Fin Svcs Llc
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/s/ Erica F. Charboneau