

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

In re: 241 Main Street, Inc.  
Debtor-In-Possession

Bk No: 1:17-bk-11392  
Chapter 11

**MOTION FOR ORDER APPROVING CONTINUED USE OF CASH COLLATERAL**

241 Main Street, Inc. (“Debtor-In-Possession” or “Debtor”) hereby moves this Court for entry of an order, pursuant to 11 U.S.C. §§ 363 authorizing Debtor’s continued use of cash collateral of RBS Citizens, N.A. (“Citizens”), Vend Lease Company (Vend Lease); Rewards Network Establishment Services, Inc., (“Rewards Network”); Sysco Boston, LLC (“Sysco”); and NextWave Enterprises, LLC (“NextWave”) or (the “Secured Creditors”) for an additional thirty (30) days, from October 26, 2017 through November 25, 2017, and to provide adequate protection to Citizens for the Debtor’s use of cash collateral and grant replacement liens to Citizens to the extent and priority as more fully set forth in the Final Order (Doc No. 29). This motion is filed because of the Debtor’s need to continue to use cash collateral to continue the operation of its business and maintain its workforce. Attached hereto is the Debtor’s most recent budget – to – actual report dated October 6, 2017.

In support of this Motion, the Debtor states the following:

The Court entered a Final Order on September 5, 2017 (Doc No. 29) authorizing use of the Citizens’ cash collateral. The Order authorized the Debtor’s use of cash collateral through October 5, 2017, with certain monthly adequate protection payments to Citizens. In addition the Court entered an Order on October 10, 2017 (Doc No. 57) authorizing the continued use of cash collateral through October 25, 2017, with certain monthly adequate protection payments to Citizens. Without continued use of cash collateral after October 25,

2017, Debtor will be unable to fund continued operations and will have to close. 241 Main Street, Inc. desires to continue to operate and continue its negotiation to propose a plan.

WHEREFORE, the Debtor requests entry of an order allowing the continued use of the Citizens' cash collateral through November 25, 2017 in order to continue operations while it proceeds to negotiate a plan.

Dated: October 16, 2017

241 Main Street, Inc.  
By its attorneys,  
/s/ Peter M. Iascone  
Peter M. Iascone & Associates, Ltd  
117 Bellevue Ave  
Newport, RI 02840  
Phone: (401) 848-5200  
Fax: (401) 846-8189

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 October 16, 2017 I electronically filed Motion for Order Approving Continued use of Cash Collateral 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](mailto:ustpreion01.pr.ecf@usdoj.gov)

Craig L. Friedrichs on behalf of Creditor Rewards Network Establishment Services Inc.  
[craig.friedrichs@quarles.com](mailto:craig.friedrichs@quarles.com), [isaac.gabriel@quarles.com](mailto:isaac.gabriel@quarles.com); [sybil.aytch@quarles.com](mailto:sybil.aytch@quarles.com)

Sandra Nicholls on behalf of Assistant U.S. Trustee Gary L. Donahue  
[sandra.nicholls@usdoj.gov](mailto:sandra.nicholls@usdoj.gov)

I hereby certify that on October 16, 2017 I have mailed by United States Postal Service, postage pre-paid, the Motion for Interim Order Approving Use of Cash Collateral and Setting Procedures for Notice and Hearing and a copy of the Notice of Electronic Filing to the attached list of non CM/ECF participants:

Kenneth F. McGunagle, Jr. on behalf of RBS Citizens, N.A.  
[kfm@mhlawpc.com](mailto:kfm@mhlawpc.com)

Betty Birch on behalf of Vend Lease Company, Inc.,  
[bbirch@vendlease.net](mailto:bbirch@vendlease.net)

Patricia Antonelli on behalf of Creditor NextWave Enterprises, LLC  
[pantonelli@cgdalaw.com](mailto:pantonelli@cgdalaw.com)

Darryl Laddin, Esquire on behalf of Creditor Sysco Boston, LLC  
[dladdin@agg.com](mailto:dladdin@agg.com)

/s/ Erica F. Charboneau