

UNITED STATES BANKRUPTCY COURT  
WESTERN DIVISION OF TENNESSEE

---

IN RE:

Advanced Primary Care, LLC

Debtor.

Case No.: 17-24732

Chapter 11

---

MOTION TO AUTHORIZE USE OF CASH COLLATERAL AND FOR EXPEDITED  
HEARING

---

COMES NOW the Debtor in Possession, Advanced Primary Care, LLC, pursuant to 11 U. S. C. 363(c)(2)(B) and Bankruptcy Rule 9013 and other applicable rules, and would state as follows:

1. It filed a second chapter 11 bankruptcy on May 30, 2017 and is serving as debtor in possession.
2. No creditor has a secured interest or other claim in Debtor's cash collateral as that term is defined in 11 U.S.C. 363(a).
3. Debtor in Possession has need of all its cash collateral from payments and receivables from all sources in order to meet its payroll, pay rent and to meet all of its other normal operating expenses.

WHEREFORE DEBTOR IN POSSESSION PRAYS:

1. That the court grant Debtor in Possession an expedited hearing.

2. That the Court authorize Advanced Primary Care, LLC to use of all cash collateral and property of the debtor during the pendency of this bankruptcy proceeding for use in its ongoing operations.
3. For such other and further relief to which it may be entitled and the premises.

/s/ Eugene G. Douglass  
Eugene G. Douglass, #7996  
Attorney for Debtor in Possession  
2820 Summer Oaks Drive  
Bartlett, Tennessee 38134  
(901) 388-5804

#### CERTIFICATE OF SERVICE

I, Eugene G. Douglass, Attorney at Law, hereby certify that a copy of the foregoing has been sent to U.S. Trustee and all interested parties by electronic notification this 2nd day of June, 2017.

/s/ Eugene G. Douglass  
Eugene G. Douglass