

DeMarco•Mitchell, PLLC
Robert T. DeMarco
Michael S. Mitchell
1255 West 15th St., 805
Plano, TX 75075
T 972-578-1400
F 972-346-6791

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:

FABRIC FANATICS, INC.

27-1832718
624 Haggard Street, Suite 706
Plano, TX 75074

Debtor.

Case No.: 18-42287-BTR-11

Chapter: 11

**DEBTOR'S EXPEDITED MOTION FOR ORDER AUTHORIZING
THE INTERIM AND FINAL USE OF CASH COLLATERAL
[11 U.S.C. §§ 105, 361, and 363]**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Fabric Fanatics, Inc., Debtor and Debtor in possession in the above-styled and numbered cases (the "**Debtor**"), and files this *Debtor's Expedited Motion for Order Authorizing the Interim and Final Use of Cash Collateral [11 U.S.C. §§ 105, 361, and 363]* by and through the undersigned attorney. Debtor requests the entry of an interim order substantially in the form attached hereto as Exhibit "A" ("**Interim Order**") and a final order ("**Final Order**"), and in conjunction with the Interim Order, the "**Cash Collateral Orders**", pursuant to 11 U.S.C. §§ 105, 361, and 363 and Federal Rules of Bankruptcy Procedure 4001 and 9014: (a) authorizing Debtor to use the cash collateral of the Lift (defined *infra*) and granting adequate protection thereto; and (b) prescribing the form and manner of notice and setting the time for the final hearing on this Motion (the "**Final Hearing**"). In support thereof Debtor respectfully shows the Court as follows:

I. JURISDICTION

1. The Court has jurisdiction over the subject matter of this Motion pursuant to 28 U.S.C. §1334(b) and the standing order of reference of the District Court. This matter is a core proceeding. 28 U.S.C. §157(b).

2. Venue in this Court is proper under 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are sections 105, 361 and 363 of title 11 of United States Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code"), and rules 2002, 4001 and 9014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

II. BACKGROUND

A. Procedural History

4. This bankruptcy case was commenced by the filing of a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code on **October 10, 2018** (the "Petition Date").

5. No trustee or examiner has been appointed, and no official committee of creditors has yet been established.

B. Business Operations

6. Debtor is a Texas corporation, which currently operates from Plano, Texas.

7. The Debtor was started in 2002 and sells only 100% cotton Batik fabrics to the retail consumer via storefront, internet, and quilt shows.

III. SECURED CREDITOR

8. In accord with Bankruptcy Rule 4001(b)(1)(B)(i) and (iii), Debtor’s sole secured creditor¹ is as follows:

SECURED CREDITOR	COLLATERAL
LiftFund 2014 Hackberry San Antonio, TX 78210	See Tax Lien attached hereto as Exhibit “B” and incorporated herein by this reference.
UCC-1 Filed:	May 1, 2017

9. LiftFund (“Lift”) asserts that it is secured by a first priority lien on substantially all of Debtor’s assets.

10. In the normal course of business, Debtor uses cash on hand and cash flow from operations to fund payroll, and other general operational needs. An inability to use these funds during the chapter 11 cases would cripple Debtor’s business operations. Indeed, Debtor must use its cash to, among other things, continue the operation of the business in an orderly manner, maintain business relationships with vendors, suppliers and customers, pay employees and satisfy other working capital and operation needs—all of which are necessary to preserve and maintain Debtor’s going-concern value and, ultimately, effectuate a successful reorganization.

IV. RELIEF REQUESTED

11. By this Motion and pursuant to 11 U.S.C. §§ 105, 361 and 363 of the Bankruptcy Code and Bankruptcy Rules 4001 and 9014, Debtor requests the Court grant the following relief:

- a. Authorize Debtor, **on an interim basis**, pursuant to section 363(c) of the Bankruptcy Code, to use proceeds of assets on which Lift asserts a first priority lien and

¹ Premised upon a review of relevant UCC-1 filings, county deed records, and related security documents.

security interest (the "**Cash Collateral**")² in accord with the budget attached to the Interim Order (the "**Budget**");

b. Authorize Debtor, **on an interim basis**, pursuant to sections 361 and 363 of the Bankruptcy Code, to provide the adequate protection described herein to IRS as regards any diminution in value of Lift's interest in the Collateral as existing on the Petition Date ("**Prepetition Collateral**"), whether from the use of Cash Collateral or the use, sale, lease, depreciation, or decline in value in the Collateral;

c. Schedule the Final Hearing pursuant to Bankruptcy Rule 4001 no later than fourteen (14) days after the entry of the Interim Order, to consider the entry of a Final Order authorizing the use of Cash Collateral and approving the notice procedures relative thereto;

d. Authorize Debtor, **on a final basis**, pursuant to section 363(c) of the Bankruptcy Code, to use the Cash Collateral in accord with the Budget and any supplemental budgets as approved by the Court after further notice and hearing; and

e. Authorize Debtor, **on a final basis**, pursuant to sections 361 and 363 of the Bankruptcy Code to provide the adequate protection described herein to Lift as regards any diminution in value of Lift's interest in the Prepetition Collateral, whether from the use of Cash Collateral or the use, sale, lease, depreciation, or decline in value of said collateral.

² Debtor does not hereby admit or consent to the validity, priority, extent or enforceability of the liens asserted by IRS and hereby reserves all rights with respect thereto.

V. **BASIS FOR RELIEF**

A. **Immediate Need for Use of Cash Collateral**

12. Pursuant to Bankruptcy Rule 4001(b)(2), the Court may conduct a preliminary cash collateral hearing within fourteen (14) days of the Petition Date if the relief requested is **necessary to avoid immediate and irreparable harm** to the estate pending a final hearing.

13. Debtor has an immediate need for the use of Cash Collateral pending a final hearing on this Motion. As of the Petition Date, Debtor lacks sufficient unencumbered cash to fund its business operation.

14. Without the use of Cash Collateral, Debtor will have no ability to operate the business. Debtor will not be able to pay its vendors and its vendors will likely cease to provide goods and services to Debtor on credit. Debtor will not be able to fund its payroll. Debtor will not be able to pay professionals necessary for the successful reorganization of its business. Finally, Debtor will not be able to service the needs of its customers. All of these outcomes will cause immediate and irreparable harm to Debtor's bankruptcy estate.

15. Debtor's ability to finance its operations and the availability to Debtor of sufficient working capital and liquidity through the use of Cash Collateral is vital to the confidence of its employees, suppliers, vendors, and customers, and to the preservation and maintenance of the going-concern value and other values of the bankruptcy estate. Debtor, therefore, seeks immediate authority to use the Cash Collateral as set forth in the Motion and in the Interim Cash Collateral Order to prevent immediate and irreparable harm to its bankruptcy estate pending the Final Hearing pursuant to Bankruptcy Rule 4001(c).

16. Debtor has formulated a Budget for the use of Cash Collateral. Debtor believes the Budget includes all reasonable, necessary and foreseeable expenses to be incurred in the

ordinary course of business during the subject time period **so as to avoid immediate and irreparable harm** to the bankruptcy estate pending a final hearing.

17. Accordingly, Debtor seeks to use Cash Collateral existing on or after the Petition Date that may be subject to Lift's interest in the Prepetition Collateral. As of the Petition Date, Debtor lacks sufficient unencumbered cash to fund the business operation.

18. If approved by this Court, Debtor's right to use Cash Collateral under the terms of the Interim Order will commence on the date of the entry of the Interim Order and expire on the earlier of: (a) the entry of a subsequent interim order; or (b) the entry of the Final Order.

B. Adequate Protection

19. In consideration for the interim use of cash collateral, and as adequate protection for any diminution of the interest of Lift in the Prepetition Collateral, Debtor hereby tenders to Lift, to the extent Lift may hold a valid, perfected and unavoidable lien in the Prepetition Collateral without any requirement to file any documents to perfect that interest, additional and replacement security interests and liens (the "**Replacement Liens**") as follows:

The granting of postpetition security interest equivalent to a lien granted under sections 364(c)(2) and (3) of the Bankruptcy Code, as applicable, in and upon the Debtor's personal property and the Cash Collateral, whether such property was acquired before or after the Petition Date.

20. In addition to the Replacement Liens, Lift is adequately protected as a result of the continued business operations. But for the continued business operation of the Debtor, the Prepetition Collateral would be reduced to a liquidation value.

C. Request for Final Hearing

21. Pursuant to Bankruptcy Rule 4001(b)(2), Debtor requests this Court set a date for the Final Hearing that is as soon as practicable, but in no event later than fourteen (14) days

following the entry of the Interim Order, and fix the time and date prior to the Final hearing for parties to file objections to this Motion.

VI. BANKRUPTCY RULE 4001(B)

22. Debtor submits the facts set forth herein establish that “the relief requested herein is necessary to avoid immediate and irreparable harm” to Debtor. Bankruptcy Rule 4001(b)(2). Accordingly, Bankruptcy Rule 4001 is satisfied.

VII. NOTICE

23. Bankruptcy Rules 4001 and 9014 generally require that any proceeding to use cash collateral be made only upon Motion and on notice to: (1) any entity that has an interest in the Cash Collateral; (2) a Committee that may be appointed under the Bankruptcy Code (11 U.S.C. § 1102) or, if no such committee is appointed, on the twenty largest unsecured creditors; and (3) such other entities as the Court may direct.

24. Service was made as set forth in the certificate of service below.

WHEREFORE, Debtor respectfully requests this Court enter an Interim Order on an emergency basis granting the relief requested herein, establishing a date and time for the Final Hearing; and for such other and further relief as is just and proper.

Respectfully submitted,

Dated: October 12, 2018

/s/ Robert T. DeMarco

DeMarco•Mitchell, PLLC

Robert T. DeMarco, Texas Bar No. 24014543

Email robert@demarcomitchell.com

Michael S. Mitchell, Texas Bar No. 00788065

Email mike@demarcomitchell.com

1255 W. 15th Street, 805

Plano, TX 75075

T 972-578-1400

F 972-346-6791

Proposed Counsel for Debtor and Debtor in Possession

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that true and correct copies of the foregoing pleading and all attachments were served upon all parties listed below in accordance with applicable rules of bankruptcy procedure on this **12th day of October, 2018**. Where possible, service was made electronically via the Court's ECF noticing system or via facsimile transmission where a facsimile number is set forth below. Where such electronic service was not possible, service was made via regular first class mail.

DEBTOR

Fabric Fanatics, Inc.
624 Haggard Street, Suite 706
Plano, TX 75074

UNITED STATES TRUSTEE

Office of the United States Trustee
110 North College Avenue, Room 300
Tyler, Texas 75702

ADDITIONAL PARTIES IN INTEREST AND/OR PARTIES REQUESTING NOTICE

LiftFund
Attention: Adrian Gonzalez
2014 Hackberry
San Antonio, TX 78210
Email: agonzalez@liftfund.com

SEE ATTACHED MATRIX

/s/ Robert T. DeMarco

DeMarco•Mitchell, PLLC

Robert T. DeMarco, Texas Bar No. 24014543

Email robert@demarcomitchell.com

Michael S. Mitchell, Texas Bar No. 00788065

Email mike@demarcomitchell.com

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EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:

FABRIC FANATICS, INC.

27-1832718

624 Haggard Street, Suite 706

Plano, TX 75074

Debtor.

Case No.: 18-42287-BTR-11

Chapter: 11

ORDER AUTHORIZING INTERIM USE OF CASH COLLATERAL

On this day came on for consideration the *Debtor's Expedited Motion for Order Authorizing the Interim and Final Use of Cash Collateral* (the "**Motion**"). The Motion is made pursuant to 11 U.S.C. §§ 105, 361 and 363 and Federal Rules of Bankruptcy Procedure 4001 and 9014: (a) authorizing the Debtor to use the Cash Collateral (defined *infra*), if any, of **LiftFund** ("**Lift**") and granting adequate protection thereto; and (b) prescribing the form and manner of notice and setting the time for the final hearing on this Motion (the "**Final Hearing**"). Upon review of the Motion, the Declaration of Lisa Anderson and based upon the evidence presented to this Court at the interim hearing on the Motion (the "**Interim Hearing**"), the Court hereby makes the following findings of fact and conclusions of law:

1. Adequate and sufficient notice of the Motion and the Interim Hearing has been provided to all persons entitled thereto pursuant to Rules 2002 and 4001 of the Federal Rules of Bankruptcy Procedure.

2. This matter constitutes a "core proceeding" within the meaning of 28 U.S.C. § 157.

3. This Court has jurisdiction over the parties and the subject matter of this proceeding pursuant to 28 U.S.C. §§ 1334 and 157.

EXHIBIT "A"

4. Fabric Fanatics, Inc., Debtor and Debtor in possession in the above-styled and numbered case (“**Debtor**”) commenced the case *sub judice* on October 10, 2018 (the “**Petition Date**”) by the filing of a petition for relief under chapter 11 of the Bankruptcy Code.

5. Lift asserts it is secured by liens on and security interests in substantially all Debtor’s property (collectively, the “**Prepetition Collateral**”) and the proceeds thereof (the “**Cash Collateral**”).

ACCORDINGLY, IT IS ORDERED THAT:

1. Debtor is permitted to use Cash Collateral, in accord with the Budget attached hereto as Exhibit “A” (the “**Budget**”) ¹, provided, that Debtor may exceed any line item in the Budget by up to ten percent (10%). The Budget may be updated and modified through the date of the Final Hearing by: (a) consensual agreement of Debtor and the Secured Lender; or (b) by further order of this Court.

2. Debtor’s right to use Cash Collateral under the Interim Order shall commence on the date of entry of the Interim Order and expire on the earlier of: (a) the entry of a subsequent interim cash collateral order; or (b) the entry of a Final Order.

3. As adequate protection of the Secured Lender’s interest, if any, in the Cash Collateral pursuant to sections 361 and 363(e) of the Bankruptcy Code to the extent of any diminution in value from the use of the Collateral the Court hereby grants the Secured Lender replacement security liens on and replacement liens on all of Debtor’s personal property (the “**Replacement Liens**”), whether such property was acquired before or after the Petition Date.

¹ As set forth in the Budget, it is currently contemplated that the Debtor shall make adequate protection payments to the Secured Lender, which payments will commence contemporaneously with the entry of a subsequent interim cash collateral order or a Final Order, and shall continue on a monthly basis thereafter.

4. Such Replacement Liens are exclusive of any avoidance actions available to the Debtor's bankruptcy estate pursuant to sections 544, 545, 547, 548, 549, 550, 553(b) and 724(a) of the Bankruptcy Code and the proceeds thereof.

5. Further, such Replacement Liens shall be equal to the aggregate diminution in value of the Collateral, if any, that occurs from and after the Petition Date. The Replacement Liens shall be of the same validity and priority as the liens of the Secured Lender on the prepetition Collateral.

6. The Replacement Liens granted herein shall maintain the same priority, validity and enforceability as the Secured Lender's liens on the prepetition Collateral. The Secured Lender shall not be required to file or serve financing statements, notices of liens or similar interests which otherwise may be required under federal or state law in any jurisdiction, or take any action, including taking possession, to validate and perfect such Replacement Liens.

7. The Replacements Liens shall be subject and subordinate to: (a) professional fees and expenses of estate professionals in the amounts currently set forth in the Budget and any supplemental budget either consensually agreed to by the Secured Lender or further approved by this Court; and (b) any and all fees payable to the United States Trustee pursuant to 28 U.S.C. § 1930(a)(6) and the Clerk of the Bankruptcy Court (collectively, the "**Carve Out**").

8. The Debtor shall maintain, insure and otherwise preserve and protect the Prepetition Collateral and the collateral upon which the Secured Lender is granted Replacement Liens (collectively, the "**Collateral**"), including, but not limited to, maintaining appropriate insurance on the Collateral, with the Secured Lender listed as loss payee under all such insurance policies.

9. This Interim Order is without prejudice to the rights of the Secured Lender or the Debtor as to any further order regarding the use of Cash Collateral as to the request for payment of any other expenses incurred during the period covered by this Interim Order.

10. This Interim Order is without prejudice to the rights of any party-in-interest, including the Debtor, to contest the priority, validity and enforceability of the Secured Lender's liens and security interests in and to the prepetition Collateral.

11. During the term of this Interim Order Debtor shall comply with all terms and conditions of the loan documents executed by the Debtor and the Secured Lender, including but not limited to the reporting requirements set forth therein, except to the extent modified herein.

12. The Final Hearing to consider the entry of a Final Order authorizing and approving the use of Cash Collateral is hereby scheduled for **October _____, 2018, at _____:_____ .m.**

13. This Interim Order is and shall be fully effective upon its entry.

ORDER SUBMITTED BY:

/s/ Robert T. DeMarco

DeMarco•Mitchell, PLLC

Robert T. DeMarco, Texas Bar No. 24014543

Email robert@demarcomitchell.com

Michael S. Mitchell, Texas Bar No. 00788065

Email mike@demarcomitchell.com

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***Proposed Counsel for Debtor and Debtor
in Possession***

EXHIBIT "A"

Fabric Fanatics INC

	Next 15 days	Next 30 days
Ordinary Income/Expense		
Income		
Sales	7,000.00	20,000.00
Total Income	<u>7,000.00</u>	<u>20,000.00</u>
Cost of Goods Sold		
COGS	2,000.00	5,000.00
Freight and Shipping	0.00	0.00
Merchant Account Fees	125.00	250.00
Total COGS	<u>2,125.00</u>	<u>5,250.00</u>
Gross Profit	4,875.00	14,750.00
Expense		
Amortization Expense	0.00	0.00
Automobile Expense		
Fuel	0.00	0.00
Service	0.00	0.00
Tolls	0.00	0.00
Total Automobile Expense	<u>0.00</u>	<u>0.00</u>
Bank Service Charges	0.00	0.00
Contract Labor	0.00	0.00
Depreciation Expense	0.00	0.00
Dues and Subscriptions	0.00	0.00
Equipment Rental	0.00	0.00
Insurance Expense		
General Liability	0.00	300.00
Health Insurance	0.00	0.00
Workman's Compensation	0.00	0.00
Total Insurance Expense	<u>0.00</u>	<u>300.00</u>
Interest Expense	0.00	0.00
Licenses and Permits	0.00	0.00
Meals and Entertainment	0.00	0.00
Office Supplies	0.00	100.00
Payroll Expenses	60.00	120.00
Postage and Delivery	150.00	300.00
Professional Fees		
Accounting Fees	0.00	0.00
Consulting	0.00	0.00
Legal Fees	0.00	0.00
Total Professional Fees	<u>0.00</u>	<u>0.00</u>
Rent Expense	0.00	4,700.00

Repairs and Maintenance	0.00	0.00
Salaries/Wages	2,700.00	5,400.00
Taxes	500.00	1,000.00
Futa Tax	0.00	150.00
Medicare	0.00	0.00
Property Taxes	0.00	0.00
Sales Tax Paid	0.00	750.00
Social Security	0.00	0.00
Suta	0.00	125.00
Total Taxes	500.00	2,025.00
Telephone Expense	225.00	225.00
Travel	0.00	0.00
Utilities	225.00	300.00
LIFTFUND (Adequate Protection)	0.00	870.00
Total Expense	3,860.00	14,340.00
Net Ordinary Income	1,015.00	410.00
Net Income	1,015.00	410.00

FOLLOW INSTRUCTIONS

A. NAME & PHONE OF CONTACT AT FILER (optional) CT Lien Solutions
B. E-MAIL CONTACT AT FILER (optional)
C. SEND ACKNOWLEDGMENT TO: (Name and Address) **CT Lien Solutions 2727 Allen Parkway Ste. 100 Houston, TX 77019 USA

FILING NUMBER: 17-0014793264
FILING DATE: 05/01/2017 01:36 PM
DOCUMENT NUMBER: 732615310001
FILED: Texas Secretary of State
IMAGE GENERATED ELECTRONICALLY FOR XML FILING
THE ABOVE SPACE IS FOR FILING OFFICE USE ONLY

1. DEBTOR'S NAME - Provide only one Debtor name (1a or 1b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 1b, leave all of item 1 blank, check here and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

OR	1a. ORGANIZATION'S NAME Fabric Fanatics , Inc.			
	1b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
1c. MAILING ADDRESS	CITY	STATE	POSTAL CODE	COUNTRY
6254 Haggard St.	Plano	TX	75025	USA

2. DEBTOR'S NAME - Provide only one Debtor name (2a or 2b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 2b, leave all of item 2 blank, check here and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

OR	2a. ORGANIZATION'S NAME			
	2b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
	Anderson	Lisa	Lehman	
2c. MAILING ADDRESS	CITY	STATE	POSTAL CODE	COUNTRY
3113 McBee Dr.	Plano	TX	75025	USA

3. SECURED PARTY'S NAME (or NAME of ASSIGNEE of ASSIGNOR SECURED PARTY) - Provide only one Secured Party name (3a or 3b)

OR	3a. ORGANIZATION'S NAME LiftFund			
	3b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
3c. MAILING ADDRESS	CITY	STATE	POSTAL CODE	COUNTRY
2014 S. Hackberry	San Antonio	TX	78210	USA

4. COLLATERAL: This financing statement covers the following collateral:
 Blanket lien on all business assets, furniture, fixtures, inventory, accounts receivable and equipment now owned and heretofore acquired, including but not limited to: Laser (13038-1404654058), Rico Printer, George Knight Press (21008), 2 Xerox Printers (AN1050193 and AFN188941), Dell Computers, 2 Desk top Computers (MXY2440417 and MXY2230PX), Convection Oven, and OKI Printers (AL58028912A0) Description: Blanket lien on all business assets, furniture, fixtures, inventory, accounts receivable and equipment now owned and heretofore acquired, including but not limited to: Fabric Inventory

5. Check only if applicable and check only one box: Collateral is held in a Trust (see UCC1Ad, item 17 and Instructions) being administered by a Decedent's Personal Representative

6a. Check only if applicable and check only one box:

Public-Finance Transaction Manufactured-Home Transaction A Debtor is a Transmitting Utility Agricultural Lien Non-UCC Filing

7. ALTERNATIVE DESIGNATION (if applicable): Lessee/Lessor Consignee/Consignor Seller/Buyer Bailee/Bailor Licensee/Licensor

8. OPTIONAL FILER REFERENCE DATA:

FILING OFFICE COPY

EXHIBIT "B"

Label Matrix for local noticing 0540-4 Case 18-42287 Eastern District of Texas Sherman Fri Oct 12 15:37:19 CDT 2018	Lisa Anderson 3113 McBee Dr. Plano, TX 75025-3621	Attorney General of Texas Bankruptcy Reporting Contact OAG/CSD/Mail Code 38 P.O. Box 12017 Austin, TX 78711-2017
Attorney General of Texas Taxation Division - Bankruptcy Box 12548 Capitol Station Austin, TX 78711-2548	Chase PO Box 15298 Wilmington, DE 19850-5298	Collin County Tax Assessor/Collector C/O Abernathy et al 1700 N. Redbud Blvd., 300 McKinney, TX 75069-3276
Robert T. DeMarco DeMarco-Mitchell, PLLC 1255 West 15th St., 805 Plano, TX 75075-7225	Fabric Fanatics, Inc. 624 Haggard St., Suite 706 Plano, TX 75074-5539	Frontier Communications PO Box 5166 Tampa, FL 33675-5166
Haggard Enterprises 800 Central Pkwy. E., Ste. 100 Plano, TX 75074-5578	Internal Revenue Service - Centralized Insolvency Operations PO Box 7346 Philadelphia, PA 19101-7346	Kabbage-Celtic Bank PO Box 77081 Atlanta, GA 30357-1081
Kenneth L. Maun Tax Assessor Collector Collin County PO Box 8046 McKinney, TX 75070-8046	Lendr.online, LLC 153 West Ohio Street 5th Floor Chicago, IL 60654-4785	Leslie Dean Anderson 3113 McBee Dr. Plano, TX 75025-3621
Lift Fund SBA Loan 2007 W Martin St. San Antonio, TX 78207-2630	Merchant Source, Inc. 153 West Ohio Street 5th Floor Chicago, IL 60654-4785	Navitas Lease Copr. PO Box 3491 Ponte Vedra Beach, FL 32004-3491
Navitas Lease Corp PO Box 3491 Ponte Vedra Beach, FL 32004-3491	Timothy W. O'Neal Office of the U.S. Trustee 110 N. College Ave. Suite 300 Tyler, TX 75702-7231	SEC 100 F Street, NE Washington, DC 20549-2001
Texas Comptroller of Public Accounts Office of the Attorney General Bankruptcy Collections Div. P.O. Box 12548, MC-008 Austin, TX 78711-2548	Texas Workforce Commission TEC Building Tax Dept. 101 E. 15th Street Austin, TX 78778-0001	U.S. Attorney General Department of Justice Main Justice Building 10th & Constitution Ave., NW Washington, DC 20530-0001
US Trustee Office of the U.S. Trustee 110 N. College Ave. Suite 300 Tyler, TX 75702-7231	United States Attorney 110 North College Ave., Ste. 700 Tyler, TX 75702-0204	United States Trustee 110 North College Ave., Ste. 300 Tyler, TX 75702-7231

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Chase
PO Box 15298
Wilmington, DE 19850-5298

(d)Frontier Communications
PO Box 5166
Tampa, FL 33675-5166

(d)Haggard Enterprises
800 Central Pkwy. E. , Ste 100
Plano, TX 75074-5578

(d)Kabbage-Celtic Bank
PO Box 77081
Atlanta, GA 30357-1081

(d)Lendr.online, LLC
153 West Ohio Street
5th Floor
Chicago, IL 60654-4785

(d)Lisa Anderson
3113 McBee Dr.
Plano, TX 75025-3621

End of Label Matrix
Mailable recipients 26
Bypassed recipients 6
Total 32