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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

KHAN GROUP, LLC

Debtor.

§
§
§
§
§

**CASE NO. 17-32886-hdh
Chapter 11**

DEBTOR’S EMERGENCY MOTION FOR USE OF CASH COLLATERAL

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW Khan Group, LLC, the Chapter 11 Debtor in the above styled and referenced bankruptcy case (the “Debtor”), and files this its Emergency Motion for Use of Cash Collateral pursuant to 11 U.S.C. § 363 of the Bankruptcy Code and in support of same would respectfully show the following:

1. On July 31, 2017, the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code. The Debtor is now operating its business and managing its property as a debtor in possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code. No request has been made for the appointment of a trustee or examiner and no official committee has been appointed.

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of the Chapter 11 case and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. Debtor requests the Court to enter an Interim Order for Use of Cash Collateral in the form attached hereto as **Exhibit “A.”**

4. Debtor has an immediate need to use the cash collateral of Benevolent Management Trust, L.D. Brown as Trustee (the “Secured Lender”), the Debtor’s secured creditor claiming liens on Debtor’s personal property including rents. The Debtor can adequately protect the interests of the Secured Lender as set forth in the proposed Interim Order for Use of Cash Collateral by providing the Secured Lender with post-petition liens, a priority claim in the Chapter 11 bankruptcy case, and cash flow payments. The cash collateral will be used to continue the Debtor’s ongoing operations. The Debtor operates a Stay Express Inn & Suites located in Sweetwater, Texas. The Budget attached to the proposed Order permits the payment of ongoing operating expenses of the Debtor in order to allow the Debtor to maintain its operations in Chapter 11. The Debtor intends to rearrange its affairs and needs to continue to operate in order to pay its ongoing expenses, generate additional income and to propose a plan in this case. The Debtor’s proposed One-Month Budget is attached hereto as **Exhibit “B.”**

5. This is an emergency matter since the Debtor has no outside sources of funding available to it and must rely on the use of cash collateral to continue its operations.

WHEREFORE, PREMISES CONSIDERED, the Debtor respectfully requests that this Court enter an Interim Order for Use of Cash Collateral in the form attached hereto as **Exhibit A”** and for such other and further relief to which the Debtor may be justly entitled.

Dated: August 2, 2017.

Respectfully submitted,

/s/ Joyce W. Lindauer

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 2, 2017, a true and correct copy of the foregoing document was served via United States first class mail, postage prepaid, upon the parties on the attached service list.

/s/ Joyce W. Lindauer

Joyce W. Lindauer

Label Matrix for local noticing
0539-3
Case 17-32886-hdh11
Northern District of Texas
Dallas
Wed Aug 2 10:05:43 CDT 2017

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7204 Debbe Drive
Dallas, TX 75252-6353

1100 Commerce Street
Room 1254
Dallas, TX 75242-1305

American Express
PO Box 650448
Dallas, TX 75265-0448

Attorney General of Texas
Bankruptcy Division
P O Box 12548
Austin, TX 78711-2548

BEVA Compass Bank
PO Box 2210
Decatur, AL 35699-0001

Benevolent Management Trust
c/o H. Alan Carmichael
Wetsel, Carmichael & Allen, L.L.P.
207 Oak Street
Sweetwater, TX 79556-4505

Bharat Vakharia
3729 Rosecliff Terrace
Buford, GA 30519-3017

Burnett Fire & Safety, LLC
PO Box 4298
Abilene, TX 79608-4298

California Connection Auto Leasing
1915 Peters Road
Suite 106
Irving, TX 75061-3205

Chase Business Quick Capital
28722 Network Place
Chicago, IL 60673-1287

Chase Ink
Cardmember Services
PO Box 94014
Palatine, IL 60094-4014

City Janitorial Supply
102 McCaulley St.
Sweetwater, TX 79556-4636

City of Sweetwater Comptroller
PO Box 450
Sweetwater, TX 79556-0450

Commercial Appliance Services
1175 Glenna
San Angelo, TX 76901-2221

(p) TEXAS COMPTROLLER OF PUBLIC ACCOUNTS
REVENUE ACCOUNTING DIV - BANKRUPTCY SECTION
PO BOX 13528
AUSTIN TX 78711-3528

(p) INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

Fabian Castillo
c/o Hall Law Firm
119 E. 3rd Street
Suite 101
Sweetwater, TX 79556-4575

In the Swim
320 Industrial Dr.
West Chicago, IL 60185-1876

Internal Revenue Service
Mail Code DAL-5020
1100 Commerce Street
Dallas, Texas 75242-1100

Kanige Humira
1601 Garrett Rd.
Apt. D307
Upper Darby, PA 19082

Lamar Glass & Mirror
103 Pecan
Sweetwater, TX 79556-4423

Lone Star Logos Management Company, LLC
3701 Bee Caves Rd.
Suite 202
Austin, TX 78746-5886

Lutfay Faroque Chisty
1600 Garrett Rd.
Apt. D307
Upper Darby, PA 19082-4419

N & S Hospitality Group, Inc.
7204 Debbe Drive
Dallas, TX 75252-6353

Orkin
1202 Pine Street
Abilene, TX 79601-3531

Salim Chotani
2121 Estrada Parkway
#1225
Irving, TX 75061-1066

Sam's Club Discover
PO Box 960016
Orlando, FL 32896-0016

Texas Unemployment Tax
101 E. 15th Street
Austin, TX 78778-1442

Texas Workforce Commission
101 East 15th Street
Austin, TX 78778-0001

Thacker Family Investment Ltd.
 890 Rivercrest Drive
 Abilene, TX 79605-2841

U. S. Attorney General
 Department of Justice
 Main Justice Building
 10th & Constitution Ave., NW
 Washington, DC 20530-0001

U. S. Trustee's Office
 1100 Commerce Street
 Room 976
 Dallas, TX 75242-1011

US Food Inc.
 PO Box 840450
 Dallas, TX 75284-0450

United States Trustee
 1100 Commerce Street
 Room 976
 Dallas, TX 75242-0996

Universal Printing Solutions, Inc.
 10573 West Pico Blvd.
 #610
 Los Angeles, CA 90064-2333

West Texas Fire
 PO Box 3085
 San Angelo, TX 76902-3085

Willis Supply
 1802 Butternut
 Abilene, TX 79602-4844

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Comptroller of Public Accounts
 Revenue Accounting Division
 Bankruptcy Section
 PO Box 13528
 Austin, TX 78711-0000

Department of the Treasury
 Internal Revenue Service
 Austin, TX 73301-0010

(d) Texas Comptroller of Public Accounts
 Revenue Accting Div - Bankr Section
 PO Box 13528
 Austin, TX 78711-3528

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

(d) Internal Revenue Service
 Centralized Insolvency Operations
 PO Box 7346
 Philadelphia, PA 19101-7346

End of Label Matrix	
Mailable recipients	38
Bypassed recipients	1
Total	39