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PROPOSED ATTORNEYS FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

IN RE:

**ROCKDALE HOSPITALITY, LLC,

Debtor.**

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**CASE NO. 18-60100-rbk
Chapter 11**

DEBTOR’S EMERGENCY MOTION FOR USE OF CASH COLLATERAL

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW Rockdale Hospitality, LLC, the Chapter 11 Debtor in the above styled and referenced bankruptcy case (the “Debtor”), and files this its 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 February 13, 2018, 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 First Guaranty Bank (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 45-room Days Inn Hotel located in Rockdale, 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: February 13, 2018.

Respectfully submitted,

/s/ Joyce W. Lindauer

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 13, 2018, 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
 0542-6
 Case 18-60100-rbk
 Western District of Texas
 Waco
 Tue Feb 13 16:47:06 CST 2018

Rockdale Hospitality, LLC
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U.S. BANKRUPTCY COURT
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 Carol Stream, IL 60197-5001

Atmos Energy
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 St. Louis, MO 63179-0311

Brady's Pest Control
 813 Mill Avenue
 Rockdale, TX 76567-3113

City of Rockdale
 PO Box 586
 Rockdale, TX 76567-0586

City of Rockdale
 c/o Mum Services, LLC
 PO Box 830725
 Birmingham, AL 35283-0725

Comptroller of Public Accounts
 111 E. 17th Street
 Austin, TX 78774-0100

Days Inn Worldwide, Inc.
 Attn: Vice President/Franchise Admin.
 PO Box 278
 Parsippany, NJ 07054

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 2221 E. Lamar Blvd.
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Triple J Fire Alarm Systems, Inc.
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End of Label Matrix
 Mailable recipients 26
 Bypassed recipients 0
 Total 26