

Eric A. Liepins
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PROPOSED ATTORNEY FOR DEBTOR

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

IN RE	§	
	§	
OPC MARKETING, INC.	§	case no. 17-34095
DEBTOR	§	

EMERGENCY MOTION FOR AUTHORITY TO USE OF CASH COLLATERAL

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, OPC Marketing, Inc (“Debtor”) and moves the Court under 11 U.S.C. §363 for Emergency Approval of Interim Use of Cash Collateral and would show the Court the following:

1. The Debtor filed a voluntary Chapter 11 Petition on November 1, 2017.
2. The Debtor must have cash to make payroll and to pay other immediate expenses to keep its doors open.
3. The Debtors business consists of the ownership and operation of a software sales and service business.
4. The Internal Revenue Service (“IRS”) assert liens on the Debtor’s accounts receivable (“Collateral”). This Collateral may constitute the cash collateral of the IRS as that term is defined in the Bankruptcy Code.

5. The Debtor is in immediately need to use the alleged cash collateral of the IRS to maintain operations of the business. The continued operations of the Debtor will necessitate the use of the cash collateral.

6. The Debtor seeks to use the alleged cash collateral of the IRS to make the payroll and continue operations. Debtor seeks interim use of the alleged cash collateral for the uses set forth on Exhibit "A".

7. An emergency exists in that the entire chance of the Debtor's reorganizing depends on the Debtor's ability to immediately obtain use the alleged Collateral of the IRS to continue operations of the company while effectuating a plan of reorganization.

8. The Debtor is willing to provide the IRS with replacement liens pursuant to 11U.S.C. section 552 in accordance with their existing priority.

WHEREFORE, PREMISES CONSIDERED, the Debtor would request this matter be set down for an Emergency Hearing and that upon hearing, this Court enter an Order authorizing the Debtor's Use of the Cash Collateral of the IRS in the amounts set forth in Exhibit "A" and to grant the IRS adequate protection in the form of replacement liens under 11 U.S.C. section 552, and for such other and further relief as the Debtor may show itself justly entitled.

Respectfully submitted,

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By: /s/ Eric Liepins
Eric A. Liepins, SBN 12338110

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Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion was sent via telecopy to the IRS at Leo.V.Carey@irs.gov and to CDC and the United States Trustee on the 2nd day of November 2017.

_____/s/ Eric Liepins_____
Eric A. Liepins

OPC MARKETING, INC.
MONTH OF NOVEMBER, 2017 BUDGET

Income		
Commission Income	\$	3,450.00
Sales		
SpitFire Enterprise Sales		47,000.00
Web Agent Sales		5,000.00
Tech Support Sales		40,000.00
Total Sales		92,000.00
 TOTAL INCOME	\$	 95,450.00
 COST OF GOOD SOLD	\$	 10,500.00
 GROSS PROFIT	\$	 84,950.00
 EXPENSES:		
Advertising	\$	2,000.00
Bank Service Charges		50.00
Dues and Subscriptions		150.00
Employee Expense		100.00
Freight and Delivery		250.00
Insurance:		
Health Insurance		2,400.00
Liability Insurance		111.00
Workers Compensation		158.00
Life Insurance		50.00
Merchant Expense		3,725.00
Miscellaneous Expense		100.00
Office Software Expense		700.00
Postage Expense		5.00
Salaries and Wages:		
Officer Salaries		12,500.00
Sales Commission		12,600.00
Sales Management		6,412.00
Tech Support		7,250.00
Technical		13,333.00
Payroll Tax Expense		4,050.00
Rent Expense		4,738.00
Professional Fees:		
Accounting		5,000.00
Outside Programming		2,000.00
Office Supplies		100.00
Telephone Expense		1,200.00
Travel & Entertainment		
Meals		100.00
TOTAL EXPENSES	\$	79,082.00
 PROFIT MONTH OF NOVEMBER 2017	\$	 5,868.00