

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF OKLAHOMA

In re: )  
ATLANTIC FABRICATION & DESIGN LLC, ) BK-17-14891-JDL  
Debtor. ) Chapter 11

**RESPONSE OF THE UNITED STATES TRUSTEE TO THE DEBTOR'S  
EXPEDITED MOTION FOR AUTHORITY TO USE CASH COLLATERAL AND  
RELATED OPERATING PROCEDURES, AND BRIEF IN SUPPORT  
AND NOTICE OF OPPORTUNITY FOR HEARING**

**[Docket #13]**

The United States Trustee ("UST") files this Response to the Debtor's Expedited Motion for Authority to Use Cash Collateral and Related Operating Procedures and Brief in Support and Notice of Opportunity for Hearing (Docket #13). In support of this response, the UST states:

1. Based on a review of the Debtor's schedules and statement of financial affairs, as well as representations made to the UST by both Debtor's counsel and counsel for the first priority secured creditor, Bank of Kremlin, the UST has no objection to the Debtor's request to use cash collateral.
2. However, the UST asserts that the Debtor's request should only be granted on an interim basis and only to the extent needed to avoid immediate and irreparable harm. To that end, the UST requests that the Debtor delineate said expenses so that it is clear as to which specific expenses need to be paid from cash collateral to avoid immediate and irreparable harm until the final hearing.

WHEREFORE, based on the foregoing, and in light of the above comments, the UST has no objection to the Debtor's request as presented.

Respectfully submitted,

s/ Marjorie J. Creasey  
Marjorie J. Creasey, OBA #17819  
Charles S. Glidewell, TxB #08030300  
Office of the United States Trustee  
215 Dean A. McGee, Fourth Floor  
Oklahoma City, OK 73102  
(405) 231-5961/231-5958 [fax]  
[Marjorie.Creasey@usdoj.gov](mailto:Marjorie.Creasey@usdoj.gov)  
[Charles.Glidewell@usdoj.gov](mailto:Charles.Glidewell@usdoj.gov)