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UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF MISSOURI SOUTHERN DIVISION

In re:

HARRIS LAND DEVELOPMENT, LLC Debtor.

Chapter 11 Case No. 14-60554-11

STIPULATION FOR USE OF CASH COLLATERAL

NOW COMES Debtor, Harris Land Development, LLC hereinafter (Harris"), by its attorneys, Ariel Weissberg and the law firm of Weissberg and Associates, Ltd. And First Community National Bank, by and through its attorney of record, and for their Stipulation for an Order providing adequate protection states to the Court as follows:

1. On April 28, 2014 Harris Land Development, LLC hereinafter ("Harris") filed a voluntary petition in the Bankruptcy Court for the Western District of Missouri seeking to reorganize under Chapter 11 of the Bankruptcy Code.

2. Debtor has continued in possession of its property.

3. First Community National Bank hereinafter ("Bank") is the holder of secured claims in the aggregate amount of approximately \$3,171,729.11.

4. The Bank and Harris have reached an agreement whereby Harris will continue to make monthly payments to Bank at the contract rate as follows:

A. Lot 42 Daniels Court (#XXX371):	\$2,320.84
B. Lot 43 Daniels Court (XXX372):	\$2,320.84
C. Lot 58 Shady Oaks, St. Robert, MO (#XXX298):	\$567.24
D. Lot 59 Shady Oaks, St. Robert, MO (#XXX278):	\$1,171.43
E. Lot 60 Shady Oaks, St. Robert, MO (#XXX279):	\$1,202.24
F. Lot 61 Shady Oaks, St. Robert, MO (#XXX299):	\$1,203.61
G. Lot 64 Shady Oaks, St. Robert, MO (#XXX300):	\$1,201.56
H. Lot 65 Ridge Creek Plat. No. 2 (#XXX264):	\$988.35
I. Lot 38 Ridge Creek Plat No. 2(#XXX263):	\$886.33
J. Peppers Sports Bar & Grill (#XXX320):	\$5,000.00

5. These total monthly payments aggregating \$16,862.44 will be made on the 30th day of the month to the Bank and shall continue until Plan Confirmation or until further order of the Court.

6. Harris agrees to keep the properties insured during the pendency of this bankruptcy case and pay real estate taxes as they accrue.

7. The parties request that the Court approve these sums as adequate protection.

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Wherefore, Harris Land Development, LLC and First Community National Bank pray that the Court approve adequate protection in the amount of monthly payments aggregating \$16,862.44 commencing the 30th day of the month and continuing up through and including Plan Confirmation.

Dated: November 19, 2014

<u>/s/ R. Brooks Kenagy</u> R. Brooks Kenagy FED#3542 MO#26163 P.O. Box 920, Courthouse Square Steelville, MO 65565 (573) 775-2100 brooks@kenagy.com Attorney for First Community National Bank

Dated: November 19, 2014

<u>/s/ Ariel Weissberg</u>

Ariel Weissberg, Esq. Weissberg and Associates, Ltd. 401 S. LaSalle St., Suite 403 Chicago, Illinois 60605 T. 312-663-0004 F. 312-663-1514 Attorney No. 03125591 Attorney for Debtor, Pro Hac Vice

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CERTIFICATE OF SERVICE

I certify that the above and foregoing document was either electronically mailed or forwarded first-class regular mail November 19, 2014, to the following parties:

Neil S. Sader, Esq. Attorney at Law 2345 Grand Blvd., Ste 1925 Kansas City, Missouri 64108 Jerry L. Phillips, Esq. Office of the U.S. Trustee 400 E. 9th Street, Room 3440 Kansas City, Missouri 64106-1910

Ariel Weissberg, Esq. Weissberg & Associates 401 S. State Street, Ste. 403 Chicago, Illinois 60605

Jonathan C. Browning on behalf of Midwest Independent Bank jbrowning@msblawafirm.com

Lee J. Viorel, III on behalf of First State Bank lviorel@lowtherjohnson.com

> <u>/s/ R. Brooks Kenagy</u> R. Brooks Kenagy FED#3542 MO#26163 P.O. Box 920, Courthouse Square Steelville, MO 65565 (573) 775-2100 brooks@kenagy.com Attorney for First Community National Bank