

UNITED STATES BANKRUPTCY COURT

MIDDLE DISTRICT OF NORTH CAROLINA

|                          |   |                       |
|--------------------------|---|-----------------------|
| In re: Banowsky Brothers | ) |                       |
| Furniture, Inc.          | ) | Case No. 18-CH11-XXXX |
|                          | ) |                       |
| Debtor                   | ) | Chapter 11            |
|                          | ) |                       |

MOTION FOR IMMEDIATE AUTHORIZATION TO PAY  
PREPETITION CLAIMS OF CRITICAL VENDORS AND FOR  
EXPEDITED HEARING

The Debtor-in-Possession (DIP), pursuant to 11 U.S.C. §363(b)(1) and the inherent equitable powers of the court granted by 11 U.S.C. §105(a), hereby moves the court for authorization to pay the following pre-petition claims:

1. Statement dated May 28, 2018 for materials received from North State Paint & Polymer Supply in the amount of \$5,900.
2. Statement dated May 27, 2018 for materials received from Hardwood Specialty, Inc. in the amount of \$2,250.

In support of its motion the DIP would show the court that the two referenced suppliers are critical suppliers to DIP without whose continued relationship the DIP cannot continue to do business and thus cannot successfully reorganize under Chapter 11. North State Paint & Polymer Supply is the only reliable source DIP has found that can provide certain polymers essential for the production of DIP's furniture. Hardwood Specialty, Inc. is the only domestic supplier of Canadian red oak used in several lines of DIP's furniture. DIP cannot finish production of its inventory-in-process without continuing to do business with these two critical suppliers. Finishing production of its inventory-in-process is a critical step in Debtor's reorganization hopes.

The DIP also moves the court to expedite the hearing on this motion and to hear it together with DIP's Motion for Authorization to Use Cash Collateral on the basis that the DIP will suffer immediate and irreparable harm if it is not authorized to pay these prepetition claims prior to the time that a final hearing can be conducted.

/s/ Lisa M. Forsyth

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Bar # NC XXX-YYY

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NOTICE OF MOTION FOR AUTHORIZATION TO PAY PREPETITION CLAIMS  
OF CRITICAL VENDORS AND OF HEARING

**NOTICE is hereby given** that on June 6, 2018 the Debtor in Possession filed a Motion for Immediate Authorization to Pay Prepetition Claims of Critical Vendors and for Expedited Hearing. A copy of the motion is attached.

A hearing on the motion will be held at 9:00 a.m. on June 8, 2018 at the United States Bankruptcy Court, Room 301 of the Federal Building in Greensboro, NC.

CERTIFICATE OF SERVICE BY MAIL,  
HAND DELIVERY, OR ELECTRONIC FILING

I certify that the foregoing Motion for Immediate Authorization to Pay Prepetition Claims of Critical Vendors and for Expedited Hearing and the accompanying Notice of Hearing were served upon the following parties in interest by hand delivery or by first-class, postage prepaid United States Mail [names and addresses of each person or entity served omitted from illustration] and upon the following parties in interest by electronic mail [names of each person or entity served omitted from illustration] on this June 6, 2018.

/s/ Lisa M. Forsyth  
Lisa M. Forsyth