

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

In re:)	Bankruptcy Case #
PREMIER KINGS, INC., <i>et al</i> ¹)	23-02871-TOM-11
Debtor)	
)	Jointly Administered

**BANKRUPTCY ADMINISTRATOR’S LIMITED OBJECTION TO DEBTOR’S
MOTION FOR ENTRY OF FINAL ORDERS (I) AUTHORIZING POSTPETITION USE
OF CASH COLLATERAL, (II) GRANTING ADEQUATE PROTECTION TO THE
PREPETITION SECURED PARTY, AND (III) GRANTING RELATED RELIEF**

The Bankruptcy Administrator for the Northern District of Alabama (hereinafter “B.A.”) by and through the undersigned as counsel, files this limited objection to the Motion of the Debtors for Entry of Final Order Authorizing Postpetition Use of Cash Collateral, Granting Adequate Protection to Prepetition Secured Parties, and Related Relief, and states as follows:

1. The Debtor filed voluntary petitions for relief under Chapter 11 of Title 11 of the U.S. Bankruptcy Code for three (3) separate Debtors-in-Possession on or about October 25, 2023 (Doc.#1). The cases were: Premier Kings, Inc. 23-02781-TOM-11; Premier Kings of North Alabama 23-02873-TOM-11; and Premier Kings of North Alabama 23-02784-TOM-11.
2. An Order was entered on or about October 30, 2023 granting Motion of Debtors (I) Directing Joint Administration of Chapter 11 Cases (Doc.#84), wherein the cases were consolidated for procedural purposes only.
3. A Motion Authorizing Postpetition Use of Cash Collateral, Granting Adequate Protection to Prepetition Secured Parties, and Related Relief, (Doc.#18) (hereinafter “Cash Collateral Motion”) was filed October 25, 2023.
4. The Cash Collateral Motion references an Interim Budget that carves out among other things “Bankruptcy Administrator Fees” (likely “Quarterly Fees”) in an amount of \$329,000.00.
5. Because the cases were only procedurally consolidated and NOT substantively consolidated, the B.A. takes the position that quarterly fees are due for each separate Debtor. Therefore, the B.A. seeks to ensure that the Interim Budget or any subsequent Approved Budget carves out sufficient funds for payment of future quarterly fees in the three (3) cases.

¹The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification numbers are: Premier Kings, Inc. (3932); Premier Kings of Georgia, Inc. (9797); and Premier Kings of North Alabama, LLC (9782). The Debtors’ address is 7078 Peachtree Industrial Blvd., Suite #800, Peachtree Corner.



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WHEREFORE, these premises considered, the Bankruptcy Administrator respectfully requests that the Budgets set aside sufficient funds to pay quarterly fees in these three (3) cases.

Respectfully submitted this the 10th day of November, 2023.

/s/ Jon A. Dudeck

Jon A. Dudeck

Assistant U.S. Bankruptcy Administrator

UNITED STATES BANKRUPTCY ADMINISTRATOR

Northern District of Alabama
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CERTIFICATE OF SERVICE

I hereby certify to the Court that on November 10, 2023, I electronically filed the above and foregoing with the court's CM/ECF system, which will send notification of such filing to all parties requesting electronic service via CM/ECF, including the following parties via CM/ECF or email:

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/s/ Jon A. Dudeck

Jon A. Dudeck

Assistant U.S. Bankruptcy Administrator