

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re)	Chapter 7
)	
TRADE AM INTERNATIONAL, INC.,)	Case No. 13-62588-MGD
)	
Debtor.)	Judge Diehl
_____)	

**SUPPLEMENT TO DEUTSCHE BANK AG, CAYMAN ISLANDS BRANCH’S
OBJECTION TO TRUSTEE’S MOTION FOR AUTHORITY TO USE CASH
COLLATERAL IN ORDER TO PAY CERTAIN TAX CLAIMS**

COMES NOW, Deutsche Bank AG, Cayman Islands Branch (“Deutsche Bank”), and hereby supplements its Objection to the Trustee’s Motion for Authority to Use Cash Collateral in Order to Pay Certain Tax Claims. As a supplement to its Objection, Deutsche Bank states as follows:

1. On or about February 14, 2014, Deutsche Bank produced various loan documents to the Trustee which provide that the cash collateral in question is fully encumbered.
2. Accordingly, the Trustee’s attempt to use fully encumbered cash collateral for a non-essential purported obligation of the estate, which the Trustee acknowledges is an “estimated” obligation, is premature and should be denied.

Respectfully submitted this 24th day of March, 2014.

GREENBERG TRAURIG, LLP

/s/ John D. Elrod _____
Michael J. King
Georgia Bar No. 421160
John D. Elrod
Georgia Bar No. 246604
3333 Piedmont Road NE, Suite 2500
Atlanta, Georgia 30305
Telephone - (678) 553-2100
Facsimile - (678) 553-2122

kingm@gtlaw.com
elrodj@gtlaw.com
*Attorneys for Deutsche Bank AG, Cayman Islands
Branch*

CERTIFICATE OF SERVICE

I hereby certify that today I served the document to which this certificate is attached by notice of electronic filing to all parties receiving notices in this case, including the following:

Matthew R. Brooks on behalf of Creditor LIT/Hodges Industrial Trust
matthew.brooks@troutmansanders.com

Neil C. Gordon on behalf of Trustee S. Gregory Hays
becky.wilkes@agg.com, angela.ford@agg.com;carol.stewart@agg.com

S. Gregory Hays
ghays@haysconsulting.net,
saskue@haysconsulting.net;kmalek@haysconsulting.net;sjose@haysconsulting.net;GA32@ecfc
bis.com

S. Gregory Hays on behalf of Trustee S. Gregory Hays
ghays@haysconsulting.net,
saskue@haysconsulting.net;kmalek@haysconsulting.net;sjose@haysconsulting.net;GA32@ecfc
bis.com

William R. Joiner on behalf of Creditor Jupiter IL, LLC
will@mitchellshapiro.com

Sean C. Kulka on behalf of Trustee S. Gregory Hays
sean.kulka@agg.com, Travis.andrews@agg.com

John M. McGovern on behalf of Creditor AmericasMart Real Estate, LLC
jmcgovern@mcgovernfirm.com

John M. McGovern on behalf of Creditor Tianjin Longxing (Group) Ltd.
jmcgovern@mcgovernfirm.com

G. Frank Nason, IV on behalf of Creditor Ashutosh Ladha
lmclane@lcsenlaw.com;rstuder@lcsenlaw.com

Office of the United States Trustee
ustpregion21.at.ecf@usdoj.gov

Edwin K. Palmer
ekpalmerlaw@aol.com, GA37@ecfcbis.com;heathermac3@comcast.net;evetta@charter.net

William Russell Patterson on behalf of Interested Party Edwin K. Palmer
wrpjr@rbsp.com, astone@rbsp.com

Christopher D. Phillips on behalf of Creditor Ashutosh Ladha

cphillips@lcsenlaw.com, emiller@lcsenlaw.com

William L. Rothschild on behalf of Creditor Jupiter IL, LLC
br@orratl.com, gb@orratl.com

William L. Rothschild on behalf of Unknown Ajay Loiwal
br@orratl.com, gb@orratl.com

J. Douglas Stewart on behalf of Creditor Agrawal Investments, LLP
dstewart@smf-law.com, scash@smf-law.com

R. Jeneane Treace on behalf of U.S. Trustee Office of the United States Trustee
jeneane.treace@usdoj.gov, Sherri.R.Carlberg@usdoj.gov

Respectfully submitted this 24th day of March, 2014.

/s/ John D. Elrod
John D. Elrod