

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW MEXICO

In re:

QUICK CASH, INC.,

Case No. 15-11800-ja11

Debtor.

**CONSUMER CLAIMANTS COMMITTEE'S OBJECTION TO MOTION TO DISMISS  
AND COUNTER-MOTION TO CONVERT CASE TO CHAPTER 7**

The official Consumer Claimants' Committee of the Quick Cash, Inc. bankruptcy estate (the "**Consumer Committee**"), by counsel, pursuant to 11 U.S.C. § 1112(b), hereby objects to the *Motion to Dismiss* filed June 30, 2017 (Doc. No. 288) (the "**Motion to Dismiss**") filed by the debtor Quick Cash, Inc. (the "**Debtor**") and moves the Court to convert the above-captioned bankruptcy case to a case under chapter 7. As grounds for and in support of this Motion, the Consumer Committee states:

1. Under 11 U.S.C. § 1112(b)(1), "on the request of a party in interest, and after notice and a hearing, the court shall convert a case under this chapter to a case under chapter 7 or dismiss a case under this chapter, whichever is in the best interests of creditors and the estate, for cause unless the court determines that the appointment under section 1104(a) of a trustee or an examiner is in the best interests of creditors and the estate."

2. Cause exists to convert or dismiss this bankruptcy case under § 1112, including substantial and continuing diminution of the estate, failure to pay administrative expenses over a prolonged period, and lack of any reasonable likelihood of reorganization under chapter 11.

3. Conversion to chapter 7, and not dismissal, is in the best interests of creditors because it would enable a chapter 7 trustee to pursue the claims raised in Adv. 17-1051-j for the benefit of the estate.

WHEREFORE, the Consumer Committee requests that the Motion to Dismiss be denied, that this Court convert the above-captioned bankruptcy case to a case under chapter 7 of the bankruptcy code, and for such other and further relief as this Court deems just and proper.

Respectfully submitted,

ASKEW & MAZEL, LLC

By: *s/ filed electronically* \_\_\_\_\_

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*Attorneys for the Consumer Committee*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing pleading was served on all counsel of record via the Court's CM/ECF electronic filing system on this 6<sup>th</sup> day of July, 2017.

*s/ Daniel A. White* \_\_\_\_\_

Daniel A. White