IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE:	§	
	§	CASE NO. 26-53221-MMP
NOBLE AND SOUND KENNELS, LLC	§	
	§	
DEBTOR.	§	CHAPTER 11

APPLICATION OF NOBLE AND SOUND KENNELS, LLC FOR AUTHORIZATION TO USE CASH COLLATERAL

TO THE HONORABLE MICHAEL M. PARKER, CHIEF JUDGE,
UNITED STATES BANKRUPTCY COURT:

NOW COMES, Noble and Sound Kennels, LLC, Debtor in Possession in the above styled and numbered Chapter 11 bankruptcy case, and files this its Application for Authorization to Use Cash Collateral, and in support thereof would respectfully show the Court the following:

1. On November 3, 2026, Noble and Sound Kennels, LLC (hereinafter called "Debtor") filed its voluntary Petition for Relief under Chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Western District of Texas, San Antonio Division, and since such date it has continued in possession and control of its estate and operated its business as a Debtor and Debtor in Possession.

2. The Debtor and its counsel ran a UCC search in the Texas Secretary of States records, a copy of which is attached hereto as Exhibit "A". The UCC search lists of a total of five (5) parties who

have filed a lien on the Debtor's personal property assets. The first UCC filing is by the SBA, which has a claim in the approximate amount of $150,000.00. The additional UCC filings re by MCA lenders, which have no value based upon the SBA's secured claim in the amount of $150,000.00, which far exceeds the value of the Debtor's personal property assets.

3. The Debtor seeks authority under 11 U.S.C. §363(c)(2)(B) to use the cash collateral of the SBA to sustain the Debtor's ongoing operations. Debtor has insufficient other unencumbered cash resources, and has been unable to obtain sufficient post-petition credit to administer its business other than pursuant to §363 of the Bankruptcy Code.

4. Debtor requires the continued use of cash collateral to make payments on, among other things, taxes, rental payments, insurance, payroll, payroll expenses, utility charges, and the costs of supplies used in the operation of the business. Such expenses are encountered by the Debtor in the ordinary course of the Debtor's business, and payment of these expenses is critical to the continued existence of the Debtor and the administration of the case and bankruptcy estate. A copy of the Debtor's proposed budget is attached hereto as Exhibit "B". The Debtor is also requesting the ability to pay its counsel $2,000.00/month for the next several months beginning on November 25, 2026.

5. The Debtor proposes to provide adequate protection to the SBA (the MCA lenders if appropriate) in the form of the following:

a. Replacement liens on all proceeds and accounts receivable generated by the use of cash collateral; and

b. The right to inspect and copy the Debtor's books and records during ordinary business hours upon at least 72 hours prior notice.

c. Monthly payments in the future to be determined by the agreement of the parties or Order of the Court.

6. Pre-petition, the Debtor's operations have suffered from the general slow down in the economy, which resulted in lower income and the Debtor's inability to timely service all of its pre-petition debt. The Debtor had monthly payments to pre-petition MCA lenders which exceeded the amount of $20,000.00/month.

7. In the event that a hearing cannot be conducted immediately, the Debtor requests preliminary, interim authorization to use cash collateral to fund the Debtor's operations for a period of fifteen (15) days pursuant to the terms contained in the budget attached hereto as Exhibit "B".

8. The Debtor submits that the use of cash collateral in the Debtor's continued operations is in the best interest of the Debtor's estate and the Debtor's creditors.

9. A copy of the Order uploaded with this Motion is attached hereto.

WHEREFORE, PREMISES CONSIDERED, Noble and Sound Kennels, LLC requests that the Court authorize it to use the cash collateral of all parties determined to have allowed liens in the Debtor's property, based upon the lien priority as it existed as of the filing of this bankruptcy case upon the terms and conditions set forth herein, and for such other and further relief to which Debtor may show itself entitled.

Date: November 3, 2026

Respectfully submitted,

/s/ William R. Davis, Jr.
WILLIAM R. DAVIS, JR.
State Bar No. 05565500
LANGLEY & BANACK, INC.
745 E. Mulberry, Suite 900
San Antonio, TX 78212
(210) 736-6600

Attorneys for FCR Partners, LP

CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2026, a true and correct copy of the above and foregoing instrument was mailed, first class, postage prepaid to the attached notice list.

/s/ William R. Davis, Jr.
WILLIAM R. DAVIS, JR.

Label Matrix for local noticing
0542-5
Case 26-53221-mmp
Western District of Texas
San Antonio
Tue Nov 3 15:50:40 CST 2026

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San Antonio, TX 78217-4418

U.S. BANKRUPTCY COURT
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Salt Lake City, UT 84111-5314

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Wilmington, DE 19850-5123

Chirag Shah
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Austin, TX 78744-7947

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Fora Financial Celtic Bank
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Internal Revenue Service
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William R. Davis Jr
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San Antonio, TX 78212-3172

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

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78283-3950

(d)Don Stecker
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End of Label Matrix
Mailable recipients 28
Bypassed recipients 0
Total 28