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Counsel for CGC Royalty Investments IV, LP

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

In re:	§	Chapter 11
	§	
VISION2SYSTEMS LLC,	§	Case No. 25-40583-11-mxm
	§	
Debtor.	§	
	§	

CGC ROYALTY INVESTMENTS IV, LP'S
NOTICE OF INTEREST IN CASH COLLATERAL

CGC Royalty Investments IV, LP ("CGC"), a secured creditor and party-in-interest in this bankruptcy case, files *CGC Royalty Investment IV, LP's Notice of Interest in Cash Collateral* (the "Notice") and respectfully represents:

1. On February 19, 2025 (the "Petition Date"), Vision2Systems LLC (the "Debtor") filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

2. On August 26, 2021, the Debtor, as borrower, executed and delivered to CGC, as payee, a Secured Promissory Note in an amount of up to $2,800,000 (the "Note"), pursuant to which CGC loaned the Debtor $2,300,000 and the Debtor agreed to pay CGC certain royalty payments as provided in the Note and the Note Purchase and Security Agreement (the "Security Agreement") dated August 26, 2021 between the Debtor and CGC. As of the Petition Date, the Debtor was indebted to CGC in the approximate amount of $3.9 million pursuant to the Note and Security Agreement.

3. The Debtor's obligations under the Note and Security Agreement are secured by a blanket lien in all property of the Debtor and the proceeds thereof. The Security Agreement includes a grant of security interest in "all of Borrower's property, tangible or intangible, now or hereafter existing and wherever located, including, without limitation, all of its inventory, goods, materials, machinery, equipment, accounts, accounts receivable, contract rights, chattel paper, instruments, software programs, copyrights, patent rights, specifications, source code, engineering designs, trade secures, and all other intellectual property and proprietary technology, notes, memoranda, drawings and other data, general intangibles, computer hardware and peripheral equipment, and all other assets of any kind now existing or hereafter arising , as each such term is used or defined in the Uniform Commercial Code as adopted by the State of Nevada" as well as "all additions, substitutions, accessions, proceeds and products thereto or thereof" (collectively, the "Collateral"). CGC's liens in the Collateral are properly perfected by a UCC-1 Financing Statement filed with the Texas Secretary of State.

4. CGC's liens in the Collateral are senior to the liens of the U.S. Small Business Association ("SBA") pursuant to a Subordination Agreement in Favor of Lender dated on or about February 16, 2022, between the SBA and CGC.

5. CGC asserts that the Debtor's cash and cash equivalents existing as of the Petition Date and all post-petition cash proceeds of the Collateral constitute CGC's cash collateral (the "Cash Collateral"). 11 U.S.C. §§ 363(a) and 552(b). Pursuant to section 363(c)(2) of the Bankruptcy Court, the Debtor is prohibited from using Cash Collateral unless CGC consents to the use of Cash Collateral or the Court authorizes such use in accordance with the provisions of section 363 of the Bankruptcy Code. At this time, CGC does not consent to the Debtor's use of CGC's Cash Collateral.

Dated: March 5, 2025.

Respectfully submitted,

/s/ Lynda L. Lankford
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Counsel for CGC Royalty Investments IV, LP

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via ECF electronic Notice on March 5, 2025.

/s/ Lynda L. Lankford
Lynda L. Lankford