

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION  
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In re:

RAD Diversified REIT, Inc.;

RAD Diversified OZ Fund, LP;

DHI Fund, LLC;

DHI Holdings, LP; *and*

DDH Fund, LLC,

Debtors.

Chapter 11

Case No. 8:26-bk-01636-CPM

*Jointly Administered with*

Case No. 8:26-bk-01637-CPM

Case No. 8:26-bk-01638-CPM

Case No. 8:26-bk-01639-CPM

Case No. 8:26-bk-01640-CPM

**DEBTORS' EMERGENCY MOTION FOR INTERIM AND FINAL  
ORDERS PURSUANT TO 11 U.S.C. §§ 105(a), 361, AND 363 OF THE  
BANKRUPTCY CODE AND RULES 2002, 4001 AND 9014 OF THE FEDERAL  
RULES OF BANKRUPTCY PROCEDURE (I) AUTHORIZING USE OF  
CASH COLLATERAL; (II) GRANTING REPLACEMENT LIENS;  
(III) GRANTING ADEQUATE PROTECTION; AND (IV) SCHEDULING HEARING**

The above-captioned debtors and debtors-in-possession (the “**Debtors**”) by and through their undersigned counsel, and pursuant to section 105(a) 361, 362, and 364 of title 11 of the United States Code, 11 U.S.C. §§ 101 et. seq. (the “**Bankruptcy Code**”) and Rule 4001(b)(2) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), move for the entry of interim and final orders (i) authorizing the Debtors to use cash collateral in the form of post-petition rents (the “**Cash Collateral**”) in which certain pre-petition mortgagees may assert an interest, (ii) granting adequate protection in the form of replacement liens and periodic reporting of rents, and

(iii) scheduling a final hearing to consider the relief requested in this Motion on a final basis, and in support state as follows:

**Jurisdiction, Venue and Statutory Predicates**

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).
2. Venue in this Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The statutory bases for the relief requested herein are sections 105, 361, 362, 363, and 507 of the Bankruptcy Code, Bankruptcy Rules, 2002, 4001, and 9014 and Local Bankruptcy Rule 2081-1(g)(1).

**Background**

**A. General Background.**

4. On March 1, 2026, the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code, commencing the above-captioned chapter 11 case (the “**Chapter 11 Cases**”) in the United States Bankruptcy Court for the Middle District of Florida.

5. The Debtors are operating their business and managing their property as debtors and debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. As of the filing of this Motion, no request has been made for the appointment of a trustee or examiner and no statutory committee has been appointed in the Chapter 11 Cases.

6. The Court has entered an order for the joint administration of the Debtors’ chapter 11 cases. [Dkt. No. 6].

**B. Cash Collateral and Parties Asserting an Interest in Cash Collateral.**

7. The Debtors’ primary source of income is rents collected from tenants. The tenants of the Debtors’ properties pay rent through AppFolio (a property management software), which funds are then transferred by ACH into Debtor RAD REIT’s pre-petition bank account at

Fifth Third Bank (the “**Pooled Rents Account**”).<sup>1</sup> Based upon Debtors’ pre-petition rent collections, Debtors anticipate collecting approximately \$90,000.00 per month in post-petition rent.

8. The balance in the Pooled Rents Account on the Petition Date was \$8,223.75. Because all rental collections received by the Debtors through AppFolio are deposited into the same account, it is impossible to trace the cash on hand to a specific tenant or parcel of property.

9. From the Petition Date through March 5, 2026, \$53,373.00 in rents have been deposited through AppFolio into the Pooled Rents Account, which represents rents received on the properties described on **Exhibit A** to this Motion.

10. Exhibit A also includes the names of the mortgagees (collectively, the “**Mortgagees**”) on each of these properties. Each of the mortgages referenced on Exhibit A includes an assignment of rents clause. By virtue of 11 U.S.C. Section 552(b), the Mortgagees have an interest in the post-petition rents collected from their respective mortgaged properties, but no other pre-petition liens against the properties described on Exhibit A would attach to post-petition rents collected by the Debtors. Thus, the Mortgagees listed on Exhibit A are the only entities with an interest in post-petition rents.

**C. Need For Use of Cash Collateral.**

11. The Debtors require the use of rents to pay operating expenses and the costs of administering their Chapter 11 Cases.

12. The Debtors will be immediately and irreparably harmed if they are not immediately granted the authority to use Cash Collateral of the Mortgagees to pay ordinary and necessary post-petition operating expenses set forth on the 3-week budget attached hereto as **Exhibit B** (the “**3-Week Budget**”). These expenses include: payroll to non-insider employees;

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<sup>1</sup> The Pooled Rents Account, while established pre-petition, is now officially designated as a debtor-in-possession account.

utilities on those properties where the lease includes utilities; software license and other fees associated with AppFolio, Quickbooks, and other accounting software; and other miscellaneous operating expenses.

13. Post-petition rental income is each Debtor's sole means of generating revenue. Use of post-petition rents to pay the expenses reflected on the 3-Week Budget will preserve the value of the properties and the bankruptcy estates as a whole and provide the resources for the Debtors to pursue their chapter 11 restructuring strategy.

14. Debtors' use of the Cash Collateral on the terms set forth herein will maximize value for all of Debtors' stakeholders and represents an exercise of the Debtors' sound business judgment.

15. As adequate protection, Debtors propose to grant each Mortgagee a replacement lien on post-petition rents from their respective properties.

16. Pending a final hearing on this Motion, the Debtors will work expeditiously with the Mortgagees and the first mortgage holders on all other rented properties to secure the consent of such mortgage holders to the Debtors' proposed use of the Cash Collateral.

### **Relief Requested**

17. By this Motion, the Debtors seek an interim emergency order authorizing use of Cash Collateral in the form of rents to pay the operating expenses shown on the 3-Week Budget pursuant to section 363(c)(2) of the Bankruptcy Code.

### **Authority For Requested Relief**

#### **A. The Debtors Should Be Authorized to Use the Cash Collateral.**

18. Section 363(c) of the Bankruptcy Code governs a debtor's use of a secured creditor's cash collateral and provides, in pertinent part, that:

The [debtor in possession] may not use, sell, or lease cash collateral  
... unless—

(A) each entity that has an interest in such cash collateral consents; or

(B) the court, after notice and a hearing, authorizes such use, sale, or lease in accordance with the provisions of this section.

11 U.S.C. § 363(c). Further, section 363(e) provides that “on request of an entity that has an interest in property . . . proposed to be used, sold, or leased, by the trustee, the court, with or without a hearing, shall prohibit or condition such use, sale, or lease as is necessary to provide adequate protection of such interest.” 11 U.S.C. § 363(e). A secured creditor is entitled to adequate protection under Bankruptcy Code Section 363(e) only from the decline in value of its collateral package post-petition. *See In re Timbers of Inwood Forest*, 484 U.S. 365, 633 (1988); *see also In re Weinstein*, 227 B.R. 284, 296 (B.A.P. 9th Cir. 1998) (“[T]he amount by which the collateral depreciates is the amount of adequate protection to which the secured creditor is entitled.”).

19. Adequate protection may be provided in various forms, including granting of replacement liens or administrative claims. Thus, what constitutes adequate protection is decided on a case-by-case basis. *See, e.g., In re Realty Sw. Assocs.*, 140 B.R. 360 (Bankr. S.D.N.Y. 1992); *In re Beker Indus. Corp.*, 58 B.R. 725, 736 (Bankr. S.D.N.Y. 1986) (the application of the concept of adequate protection “is left to the vagaries of each case, but its focus is protection of the secured creditor from diminution in the value of its collateral during the reorganization process”) (internal citation omitted). The critical purpose of adequate protection is to guard against the diminution of a secured creditor’s collateral during the period when such collateral is being used by the debtor. *See In re 495 Central Park Avenue Corp.*, 136 B.R. 626, 631 (Bankr. S.D.N.Y. 1992) (“The goal of adequate protection is to safeguard the secured creditor from diminution in the value of its interest during the chapter 11 reorganization.”).

**B. The Debtors are Providing Adequate Protection to the Prepetition Lenders.**

20. Debtors propose to grant each first mortgagee with an assignment of rents with a replacement lien on post-petition rents from their respective properties. Accordingly, the Mortgagees are adequately protected by replacement liens in the Debtors' post-petition revenues generated from its tenants in the ordinary course.

21. Further, use of the Cash Collateral will allow the Debtors to pay the necessary expenses for the operation of their business. Courts have made clear that a debtor's use of cash collateral, to preserve and enhance the prospects of a successful reorganization, prevents deterioration of the value of the Debtors' property and can constitute adequate protection. As the Tenth Circuit Court of Appeals stated, in *In re O'Connor*, 808 F.2d 1393, 1397-98 (10th Cir. 1987):

Because the ultimate benefit to be achieved by a successful reorganization inures to all the creditors of the estate, a fair opportunity must be given to the Debtors to achieve that end. Thus, while interests of the secured creditor whose property rights are of concern to the court, the interests of all other creditors also have bearing upon the question of whether use of cash collateral shall be permitted during the early stages of administration.

22. Stabilizing the Debtors' business operations through a Chapter 11 restructuring will maximize the value of all properties in the Debtors' portfolio.

23. Debtors further propose to provide each Mortgagee that has an assignment of rents with monthly reporting of rents collected from their respective properties.

24. Absent use of Cash Collateral, the Debtors' operations will cease, resulting in a significant diminution in the value of all of the Debtors' assets.

25. Bankruptcy Rule 4001(b)(2) provides the Court may conduct a preliminary on a request to use cash collateral prior to the normal 14-day notice period if the Debtors are able to



**Exhibit A**

**Post-Petition Rents Collected Through March 5, 2026**

<b>Property</b>	<b>Entity</b>	<b>Rent Paid</b>	<b>Mortgagor</b>	<b>Mortgagor Counsel</b>
1161 E. Phil Ellena St. Philadelphia, PA 19150	DDH Fund, LLC	\$0.00	Wilmington Savings Fund Society, FSB, not in its individual capacity but solely as trustee of NYMT Loan Trust 2024-INV1 500 Delaware Ave., 11th Floor Wilmington, DE 19801	Friedman Vartolo 1325 Franklin Ave., Suite 160 Garden City, NJ 11530
127 W. Apsley St. Philadelphia, PA 19144	DDH Fund, LLC	\$120.00	U.S. Bank Trust National Assoc. not in its individual capacity but solely as owner trustee of Saluda Grade Alternative Mortgage Trust 2024-INV2 1011 Centre Road, Suite 203 Wilmington, DE 19805	
2603 W. Seltzer St. Philadelphia, PA 19132	DDH Fund, LLC	\$60.00	Wilmington Savings Fund Society, FSB, not in its individual capacity but solely as trustee of NYMT Loan Trust 2024-INV1 440 South La Salle Street, Suite 2000 Chicago, IL 60605	Friedman Vartolo 1325 Franklin Ave., Suite 160 Garden City, NJ 11530
2235 N. 22nd St. Philadelphia, PA 19132	DDH Fund, LLC	\$3,626.50	Tryon Street Acquisition Trust 1 300 S. Tryon St. Charlotte, NC 28202  Tryon Street Acquisition Trust 1 One Marina Park Drive Boston, MA 02210	Friedman Vartolo 1325 Franklin Ave., Suite 160 Garden City, NJ 11530
8010 Silver Lure Dr. Humble, TX 77346	DDH Fund, LLC	\$600.00	CV3 Alpha Trust 2101 E. El Segundo Blvd., Ste. 203 El Segundo, CA 90245	
2749 N. Dover St. Philadelphia, PA 19132	DDH Fund, LLC	\$1,295.00	U.S. Bank National Association as Trustee of Greene Street Funding Trust II 60 Livingston Ave. EP-MN-WS3D Saint Paul. MN 55107	

<b>Property</b>	<b>Entity</b>	<b>Rent Paid</b>	<b>Mortgagor</b>	<b>Mortgagor Counsel</b>
196 W. Chew Ave. Philadelphia, PA 19120	DDH Fund, LLC	\$1,875.00	U.S. Bank Trust National Assoc. not in its individual capacity but solely as owner trustee of Saluda Grade Loan Trust I 500 Delaware Av., 11th Floor Wilmington, DE 19801	
487 Wigard Ave. Philadelphia, PA 19128	DDH Fund, LLC	\$2,109.50	Wilmington Savings Fund Society, FSB, not in its individual capacity but solely as trustee of NYMT Loan Trust 2024-INV1 440 South La Salle Street, Suite 2000 Chicago, IL 60605	Friedman Vartolo 1325 Franklin Ave. Suite 160 Garden City, NJ 11530
907 Centerbrook Dr. Brandon, FL 33511	DDH Fund, LLC	\$3,500.00	Wilmington Savings Fund Society, FSB, not in its individual capacity but solely as owner trustee of SG Alternative Title Trust 2025-NPL2 500 Delaware Avenue, 11th Floor Wilmington, DE 19801	Diaz Anselmo & Associates, P.A. 499 NW 70th Ave., Ste. 309 Fort Lauderdale, FL 33317
1609 N. 18th St. Philadelphia, PA 19121	DDH Fund, LLC	\$535.51	Wilmington Savings Fund Society, FSB, not in its individual capacity but solely as Trustee of Starwood Mortgage Residential Trust 2021-2 c/o Select Portfolio Servicing, Inc. 3217 S. Decker Lake Dr. Salt Lake City, UT 84119	KML Law Group, P.C. 701 Market St., Ste. 5000 Philadelphia, PA 19106
5743 N. Beechwood St. Philadelphia, PA 19138	DDH Fund, LLC	\$677.75	Wilmington Savings Fund Society, FSB, not in its individual capacity but solely as Trustee of Starwood Mortgage Residential Trust 2021-2 3217 S. Decker Lake Drive Salt Lake City, UT 84119	KML Law Group, P.C. 701 Market St., Ste. 5000 Philadelphia, PA 19106
9000 West Chester Pike Upper Darby, PA 19082	DDH Fund, LLC	\$684.50	U.S. Bank National Association, as Trustee for Velocity Commercial Capital Loan Trust 2021-3 2945 Townsgate Road, Suite #110 Westlake Village, CA 93161	

<b>Property</b>	<b>Entity</b>	<b>Rent Paid</b>	<b>Mortgagor</b>	<b>Mortgagor Counsel</b>
5734 Christian St. Philadelphia, PA 19143	DDH Fund, LLC	\$1,285.50	Wilmington Savings Fund Society, FSB, not in its individual capacity but solely as Trustee of Starwood Mortgage Residential Trust 2021-2 3217 S. Decker Lake Drive Salt Lake City, UT 84119	KML Law Group, P.C. 701 Market St., Ste. 5000 Philadelphia, PA 19106
1744 N. Wilton St. Philadelphia, PA 19131	DDH Fund, LLC	\$1,450.00	Wilmington Savings Fund Society, FSB, not In Its individual capacity but solely as Trustee of Starwood Mortgage Residential Trust 2021-2 c/o Select Portfolio Servicing, Inc. 3217 S. Decker Lake Dr.	KML Law Group, P.C. 701 Market St., Ste. 5000 Philadelphia, PA 19106
1327 N. Wanamaker St. Philadelphia, PA 19131	DDH Fund, LLC	\$1,460.50	Wilmington Savings Fund Society, FSB, not in its individual capacity but solely as owner trustee of Saluda Grade Alternative Mortgage Trust 2024-INV1 500 Delaware Ave., 11th Floor Wilmington, DE 19801	
3146 Hanover Pike Hanover, PA 17331	DDH Fund, LLC	\$1,610.50	Metropolitan Life Insurance Company One Metlife Way Whippany, NJ 07981	Friedman Vartolo 1325 Franklin Ave., Suite 160 Garden City, NJ 11530
4488 Livingston St. Philadelphia, PA 19137	DDH Fund, LLC	\$1,775.00	U.S. Bank Trust Company, National Association, not in its individual capacity but solely as trustee for the BINOM Securitization Trust 2022-INV1 60 Livingston Avenue, EP-MN-WSJD Saint Paul. MN 55107	
1345 Harshaw Rd. Brookhaven, PA 19015	DDH Fund, LLC	\$1,820.00	U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for Legacy Mortgage Asset Trust 2024-INV1 60 Livingston Ave., EP-MN-WS3D Saint Paul. MN 55107	Friedman Vartolo 1325 Franklin Ave., Suite 160 Garden City, NJ 11530

<b>Property</b>	<b>Entity</b>	<b>Rent Paid</b>	<b>Mortgagor</b>	<b>Mortgagor Counsel</b>
3914 Fairdale Rd. Philadelphia, PA 19154	DDH Fund, LLC	\$2,950.00	U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for Legacy Mortgage Asset Trust 2024-INV1 60 Livingston Ave. EP-MB-WS3D Saint Paul. MN 55107	
11927 Moss Branch Rd. Houston, TX 77043	DHI Holdings, LP	\$1,900.00	U.S. Bank National Association, not in its individual capacity but solely as Trustee for Spartan Funding I Trust 60 Livingston Ave. Saint Paul, MN 55107	
8210 Easter St. Houston, TX 77088	DHI Holdings, LP	\$900.00	No mortgage	
24 S. Salford St, Philadelphia, PA 19139	RAD Diversified OZ Fund, LLC	\$600.00	Wilmington Savings Fund Society, FSB, as Trustee for Residential Mortgage Aggregation Trust 90 Park Avenue, 23rd Floor New York, NY 10016	Larocca Hornik et al 475 County Rd. 520, Ste. 200 Marlboro, NJ 07746
221 W. Clapier St. Philadelphia, PA 19144	RAD Diversified REIT, Inc.	\$760.50	U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for Legacy Mortgage Asset Trust 2024-INV1 60 Livingston Ave., EP-MN-WS3D Saint Paul. MN 55107	Friedman Vartolo 1325 Franklin Ave., Suite 160 Garden City, NJ 11530
5224 Westminster Ave. Philadelphia, PA 19131	RAD Diversified REIT, Inc.	\$10.50	U.S. Bank Trust National Association, not in its individual capacity, but solely as Delaware trustee for Determination Mortgage Trust 425 S Financial Street, Suite 2000 Chicago, IL 60605	Friedman Vartolo 1325 Franklin Ave., Suite 160 Garden City, NJ 11530
144 Barrington Dr. Brandon, FL 33511	RAD Diversified REIT, Inc.	\$2,154.62	U.S. Bank National Association, as trustee of the NRZ Pass-Through Trust XVI-B 15303 Ventura Blvd., Ste. #700 Sherman Oaks, CA 91403	

<b>Property</b>	<b>Entity</b>	<b>Rent Paid</b>	<b>Mortgagor</b>	<b>Mortgagor Counsel</b>
880 N. 66th St. Philadelphia, PA 19151	RAD Diversified REIT, Inc.	\$300.00	U.S. Bank National Association, as trustee of the NRZ Pass-Through Trust XVI-B 15303 Ventura Blvd., Ste. #700 Sherman Oaks, CA 91403	
1105 Madison St. Chester, PA 19013	RAD Diversified REIT, Inc.	\$400.00	U.S. Bank Trust National Association, not in its individual capacity but solely as Delaware trustee for Stone Roots M Trust 1101 Centre Rd., Ste. 203 Wilmington, DE 19805	Friedman Vartolo 1325 Franklin Ave., Suite 160 Garden City, NJ 11530
2627 N. 23rd St. Philadelphia, PA 19132	RAD Diversified REIT, Inc.	\$1,330.00	No mortgage	
1764 N. Aberdeen St. Philadelphia, PA 19131	RAD Diversified REIT, Inc.	\$500.00	Wilmington Savings Fund Society, FSB, not in its individual capacity but solely as trustee for Ibis Holdings A Trust 500 Delaware Ave., 11th Floor Wilmington, DE 19801	
5544 Linmore Ave. Philadelphia, PA 19143	RAD Diversified REIT, Inc.	\$725.00	No mortgage	
339 Taylor Terrace Chester, PA 19013	RAD Diversified REIT, Inc.	\$880.00	U.S. Bank Trust National Association, Not In Its Individual Capacity, But Solely As Trustee For Fidelity & Guaranty Life Mortgage Trust 2018-1 300 East Delaware Avenue, 8th Floor Wilmington, DE 19809	Friedman Vartolo 1325 Franklin Ave., Suite 160 Garden City, NJ 11530
340 W. Berkley St. Philadelphia, PA 19144	RAD Diversified REIT, Inc.	\$900.00	LHome Mortgage Trust 2024-RTL3 2 Allegheny Center Nova Tower 2, Ste. 200 Pittsburgh, PA 15212	
3601 W. 13th St. Trainer, PA 19061	RAD Diversified REIT, Inc.	\$1,000.00	U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for Legacy Mortgage Asset Trust 2024-INV1 60 Livingston Ave., EP-MN-WS3D Saint Paul, MN 55107	Friedman Vartolo 1325 Franklin Ave., Suite 160 Garden City, NJ 11530

<b>Property</b>	<b>Entity</b>	<b>Rent Paid</b>	<b>Mortgagor</b>	<b>Mortgagor Counsel</b>
5546 Bloyd St. Philadelphia, PA 19138	RAD Diversified REIT, Inc.	\$1,100.00	U.S. Bank National Association as Trustee of Greene Street Funding Trust II 60 Livingston Ave., EP-MN-WS3D Saint Paul. MN 55107	
2141 Carver St. Philadelphia, PA 19124	RAD Diversified REIT, Inc.	\$1,255.00	U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for Legacy Mortgage Asset Trust 2024-INV1 60 Livingston Ave., EP-MN-WS3D Saint Paul. MN 55107	Friedman Vartolo 1325 Franklin Ave., Suite 160 Garden City, NJ 11530
1168 E. 9th St. Eddystone, PA 19022	RAD Diversified REIT, Inc.	\$1,300.00	U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for Legacy Mortgage Asset Trust 2024-INV1 60 Livingston Ave., EP-MN-WS3D Saint Paul. MN 55107	Friedman Vartolo 1325 Franklin Ave., Suite 160 Garden City, NJ 11530
4005 Gideon Rd. Brookhaven, PA 19015	RAD Diversified REIT, Inc.	\$1,400.50	U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee for Legacy Mortgage Asset Trust 2024-INV1 60 Livingston Ave., EP-MN-WS3D Saint Paul. MN 55107	Friedman Vartolo 1325 Franklin Ave., Suite 160 Garden City, NJ 11530
5350 Chancellor St. Philadelphia, PA 19139	RAD Diversified REIT, Inc.	\$1,585.50	U.S. Bank Trust National Association, not in its individual capacity, but solely as Delaware trustee for Determination Mortgage Trust 425 S Financial Street, Suite 2000 Chicago, IL 60605	Friedman Vartolo 1325 Franklin Ave., Suite 160 Garden City, NJ 11530
824 S. 58th St. Philadelphia, PA 19143	RAD Diversified REIT, Inc.	\$1,960.50	Metropolitan Life Insurance Company One Metlife Way Whippany, NJ 07981	

<b>Property</b>	<b>Entity</b>	<b>Rent Paid</b>	<b>Mortgagor</b>	<b>Mortgagor Counsel</b>
412 Hohldale St. Houston, TX 77091	RAD Diversified REIT, Inc.	\$2,400.00	LHome Mortgage Trust 2023-RTL-2 c/o Kiavi Funding, Inc. 2 Allegheny Center Nova Tower 2, Ste. 200 Pittsburgh, PA 15212	Miller, George & Suggs, PLLC 6080 Tennyson Pkwy., Ste. 100 Plano, TX 75024
7061 Reedland St. Philadelphia, PA 19142	RAD Diversified REIT, Inc.	\$2,576.00	NWL Company, LLC 309 W. 49th St. New York, NY 10019	
<b>GRAND TOTAL</b>		<b>\$53,373.38</b>		

**Exhibit B**

**3-Week Budget**

**RADD Diversified REIT, Inc.**  
**13 Week Cash Forecast**  
**Prepared on March 6, 2026**  
**in \$ 000s**

Week Ending	<u>6-Mar</u>	<u>13-Mar</u>	<u>20-Mar</u>
Lease Revenue	22,500	22,500	22,500
Other Income	17,500		
Net Property Sale Income	-	-	-
DIP financing	-	-	-
Total Income	40,000	22,500	22,500
Payroll / Independent Contractors			17,152
Utilities	3,344	3,344	3,344
Software	3,500	3,500	3,500
Other operating expenses	5,000	5,000	5,000
Total Operating Expenses	11,844	11,844	28,996
Operating cash flow	28,156	10,656	(6,496)
Professional fees	-	-	-
Director Fee	-	-	4,500
US Trustee fees	-	-	-
Non operating Expenses	-	-	4,500
Net Cash Flow	28,156	10,656	(10,996)
Beginning cash	8,224	36,380	47,036
Net Cash Flow	28,156	10,656	(10,996)
Ending cash	36,380	47,036	36,040