UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI

In Re:	)	**In Proceedings Under Chapter 11**
	)	
ARROW SPEED WAREHOUSE, INC,. *et al*.	)	**Case No. 08-50698-JWV**
Debtors.	)	**Joint Administered**
_____	)	
	)	
ARROW SPEED WAREHOUSE, INC., *et al*.	)	**Adv. Case No. 09-_____**
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
G & W TRUCK ACCESSORIES, INC. DBA BLACK JACK TRUCK ACCESSORIES ADBA BLACKJACK TRUCK ACCESSORIES, 553 SE Oldham Road Lee's Summit, Missouri 64081	)	
	)	
Serve Registered Agent: Gary L. Weyrauch 510 Granada Lees Summit, Missouri 64063	)	
	)	
Defendant(s).	)	
_____	)	

COMPLAINT FOR TURNOVER OF PROPERTY OF ESTATE PURSUANT TO 11 U.S.C. § 542

Debtors Arrow Speed Warehouse, Inc., *et al*. ("Debtors"), for their Complaint for Turnover of Property of Estate Pursuant to 11 U.S.C. § 542 (the "Complaint") against defendant G & W Truck Accessories, Inc. dba Black Jack Truck Accessories adba BlackJack Truck Accessories ("Defendant"), state as follows:

1. The Court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C § 1334 as a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(E).

2. Venue properly lies in this judicial district pursuant to 28 U.S.C. § 1409(a) in that the Complaint is related to the captioned case.

3. The statutory predicates for the Complaint are 11 U.S. C §§ 363, 521, 542, 1107.

4. On September 21, 2008 (the "Filing Date"), Debtors filed their separate voluntary

petitions for bankruptcy relief under Chapter 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101 through 1146.

5. Debtors sold product (the "Product") to Defendant (the "Product") in the amount of $75,807.73 (the "Debt"), as evidenced by the statement of outstanding invoices attached as **Exhibit A**, for which Defendant has not paid.

6. Pursuant to that certain Credit Application (the "Application") Defendant agreed to pay reasonable attorney's fees incurred by Plaintiff for which Plaintiff seeks at least the sum of $3,000.00. A true and correct copy of the Application is attached hereto as **Exhibit B** and incorporated herein by this reference as if fully set forth herein.

7. Pursuant to 11 U.S.C. § 542(b), an entity that owes a debt that is property of the estate and that is matured, payable on demand, or payable on order, shall pay such debt to, or on the order of, the debtor-in-possession.[1]

8. The Debt is property of the estate pursuant to 11 U.S.C. § 541.

9. The Debt is matured, payable on demand, or payable on order.

10. The Debt is not subject to setoff under 11 U.S.C. § 553.

11. As a result of Defendant's failure to pay the Debt, on December 18, 2008, Debtors made demand upon Defendant for payment of the Debt. To date, Defendant has failed and refused to pay the Debt.

WHEREFORE, Debtors pray that judgment be entered against Defendant, ordering Defendant to pay the Debt immediately to Debtors, along with reasonable attorney's fees in at least the amount of $3,000.00, interest and costs of the suit incurred herein, and for such other and further relief as the Court deems fair, just and equitable under the circumstances.

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[1]Under 11 U.S.C § 1107 the debtor-in-possession, with limited exceptions which are not applicable in this case, shall perform all the functions and duties of a trustee.

Respectfully submitted:
McDowell, Rice, Smith & Buchanan, P.C.

By: /s/ Louis J. Wade
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ATTORNEY FOR DEBTORS

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v.	)	
	)	
G & W TRUCK ACCESSORIES, INC. DBA BLACK JACK TRUCK ACCESSORIES ADBA BLACKJACK TRUCK ACCESSORIES,	)	
	)	
Defendant(s).	)	
_____	)	

SUMMARY OF EXHIBITS

The following exhibits referenced in Arrow Speed Warehouse, Inc.'s Complaint for Turnover of Property of Estate Pursuant to 11 U.S.C. § 542:

A. Statement of Outstanding Invoices

B. Credit Application

McDowell, Rice, Smith & Buchanan P.C.

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