

19. It is anticipated that the sudden closure of the Debtor's Bank Accounts and Escrow Accounts would disrupt the method by which the Debtor manages his deposits and how his daily cash needs are funded. Pending a final resolution of these issues, the Debtor agrees all Bank Accounts and Escrow Accounts will be designated as Debtor-in-Possession bank accounts.

20. No prior request for the relief sought in this Motion has been made to this or any other Court.

WHEREFORE, the Debtor respectfully request that the Court enter an Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein on an interim basis, and granting such other and further relief as the Court deems just and proper.

Dated: Syracuse, New York  
April 21, 2023

**BARCLAY DAMON, LLP**

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