

Lienholders with roll-over adequate liens on all Post-Petition acquired Collateral, to the same extent, validity and priority as held by the **Lienholders** on Pre-Petition Collateral, and to provide **Lienholders** with regular payments as provided for in the Loan Documents

- (d) Term of Interim Cash Collateral Order. The Interim Cash Collateral Order has a proposed expiration date of May __, 2023.

BACKGROUND

6. On April 20, 2023 (the "Petition Date"), the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court for the Northern District of New York (the "Court"), commencing the Debtor's Chapter 11 case (this "Chapter 11 Case"). The Debtor continues to operate its business and manage its assets as a debtor in possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

7. The Debtor is an individual who operates multiple businesses.
8. The Debtor is 100% owner of Miles B. Marshall, Inc., which operates an insurance agency.
9. Additionally, the Debtor is engaged in business individually and through "doing business as" ("dba") designations in the areas of tax preparation services, storage services, printing services, and rental services. The Debtor's six dba's include: M&M Press, Marshall Tax Service, Marshall Moving, Marshall Storage, Marshall Maintenance and Marshall Rentals.

10. The Debtor owns over one hundred rental properties containing over 240 residential units through M. Burton Marshall d/b/a Marshall Rentals. I currently hold 249 tenant security deposits in segregated accounts. Nineteen of the properties are subject to mortgages, and fourteen of those mortgages contain an assignment of rents provision, pledging rent received from tenants as additional collateral for the underlying loan.

11. The Debtor's rental properties range from a two-family building to a seven unit building.
12. The Debtor's rental properties which are encumbered by mortgages are: