

The Debtor continues to operate its businesses and manage its properties as a debtor in possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

1. The Debtor is an individual who has various business interests.

2. The Debtor is 100% owner of Miles B. Marshall, Inc., a corporation through which the Debtor sells insurance.

3. Additionally, the Debtor is engaged in a personal capacity and does business as an individual through a “doing business as” designation (“dba”) in the areas of tax preparation services, storage services, printing services, and rental services. The Debtor’s six dba’s include: M&M Press Checking, Marshall Tax Service, Marshall Moving, Marshall Storage, Marshall Maintenance and Marshall Rentals.

3. The Debtor own multiple properties at which he resides, operates his businesses, and rents to commercial and residential tenants. Attached hereto as Exhibit A (the “Utility List”)¹ is a list of the utilities companies, the various account numbers, and the service addresses for those accounts.

4. A further explanation of the facts and circumstances supporting this Motion are set forth in the Declaration of Miles Burton Marshall to Local Bankruptcy Rule 2015-6 filed on April 20, 2023 and incorporated herein by reference.

¹ The Debtor has made an extensive good faith effort to identify all of the Utility Companies that provide service to the Debtor and include them on the Utility List. To the extent such information is readily ascertainable, the Utility List identifies the following information for each Utility Company: (a) the name of the Utility Company; (b) the account number or numbers under which the Utility Company provides services to the Debtor; and (c) the security deposit, if any, each Utility Company holds. The inclusion of any entity on, or any omission of any entity from, the Utility List is not an admission by the Debtor that such entity is or is not a utility within the meaning of Section 366 of the Bankruptcy Code, and the Debtor reserves its rights with respect thereto. In addition, the Debtor requests that this Motion apply to all of the Debtor’s Utility Companies, whether or not any given Utility Company is included on the Utility List. The Debtor has proposed a procedure for supplementing the Utility List. Additionally, it is possible that certain entities may have been mistakenly included on the Utility List and, therefore, the Debtor reserves its right to assert that any such entities are not Utility Companies for the purposes of this Motion or Section 366 of the Bankruptcy Code.