

RELIEF REQUESTED

5. Pursuant to Section 366(a) of the Bankruptcy Code, the Debtor seeks entry of interim and final orders (the “Order”) (a) prohibiting those utility companies (each a “Utility Company” and, collectively, the “Utility Companies”) that provide service to the Debtor from altering, refusing, or discontinuing services to, or discriminating against, the Debtor on account of the filing of the instant case pursuant to the Bankruptcy Code or any pre-petition amounts due to them from the Debtor; and (b) determining that the Utility Companies have adequate assurance of payment.

The Utility Companies

6. The Debtor currently obtains electricity, natural gas, cable, internet, sewer, water and other similar services provided by the Utility Companies identified on the attached Exhibit A. The Debtor’s Utility Companies provide traditional utility services related to the day-to-day operation and maintenance of the Debtor’s various properties and offices. As of the Petition Date, the Debtor was current on its accounts with the Utility Companies, although some current bills, or bills yet to be received, may include charges for services rendered prior to the Petition Date. *See* Exhibit A.

7. Preserving utility services on an uninterrupted basis is essential to the Debtor’s ongoing operations, and, therefore, to the success of its case. Any interruption of utility services, even for a brief period of time, would jeopardize the Debtor’s operations, tenant relationships, revenue, and ultimately, the Debtor’s going concern value and creditors’ recoveries. It is critical that the utility services continue uninterrupted during this Chapter 11 case.