WAIVER OF NOTICE AND STAY REQUIREMENTS

21. To implement the foregoing successfully, the Debtor seeks a waiver of the notice requirements under Fed. Bankr. Rule 6004(a) and any stay of an order granting the relief requested herein pursuant to Fed. Bankr. Rules 6004(h), 7062, 9014, or otherwise, to the extent they may apply.

RESERVATION OF RIGHTS

22. Nothing in this Motion, nor any payment made pursuant to the relief sought herein, if granted, is intended or should be construed as an admission as to the validity, priority or amount of any claim against the Debtor, a waiver of the Debtor's rights to dispute any claim or an approval or assumption of any agreement, contract or lease under Section 365 of the Bankruptcy Code and the Debtor expressly reserves its rights with respect thereto.

NOTICE

23. Notice of this Motion has been provided to: (i) the U.S. Trustee for the Northern District of New York; (ii) Office of the United States Trustee; (iii) Twenty Largest Unsecured Creditors; (iv) the Utility Companies identified on the Utility List attached hereto as Exhibit A; and. (v) all parties requesting notice. The Debtor submits that no other or further notice need be provided.

WHEREFORE, the Debtor respectfully requests that the Court enter an interim orders, substantially in the forms attached hereto as Exhibit B, and grant such further relief as is just and proper.

Dated: Syracuse, New York
April 21, 2023

BARCLAY DAMON, LLP
By: */s/Jeffrey A. Dove*
Jeffrey A. Dove, Esq.
Beth Ann Bivona, Esq.
Proposed Counsel for Debtor and