

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

iM3NY LLC, *et al.*,

Debtors.¹

Chapter 11

Case No. 25-10131 (BLS)

(Jointly Administered)

Re: Docket No.: 119

OBJECTION TO CURE AMOUNT

Phoenix Endicott Industrial Investors, LLC (“Phoenix”) hereby submits this objection (the “Objection”) to the Debtors’ proposed Cure Amount set forth on Exhibit A to the *Notice of Assumption, Assignment and Cure Amount with Respect to Executory Contracts and Unexpired Leases of the Debtors* (the “Assumption Notice”) filed on February 28, 2025 (Dkt. 119) with respect to Phoenix (the “Proposed Phoenix Cure Amount”). In support of its Objection, Phoenix respectfully states as follows:

1. Phoenix and Debtor Imperium3 New York, Inc. (“Imperium3”) are party to (a) that certain Real Estate Lease Agreement, dated as of March 29, 2021, between Imperium3, as tenant, and Huron Real Estate Associates LLC (“Huron”), as landlord, as amended and supplemented, including by that First Amendment to Lease, dated as of September 21, 2021, for approximately 275,657 square feet located in Endicott, New York (the “Manufacturing Lease”) and (b) that certain Lease Agreement, executed as of March 9, 2021, between Huron and Imperium3 for approximately 7,284 square feet of office space located in Endicott, New York (the “Office Lease,” and together with the Manufacturing Lease, the “Endicott Leases”), both of which were assigned by Huron to

¹ The Debtors in these chapter 11 cases, along with the last four digits of their respective tax identification numbers, are as follows: (i) iM3NY LLC (N/A); and (ii) Imperium3 New York, Inc. (4574). The address of the Debtors’ corporate headquarters is 1093 Clark Street, Endicott, New York 13760.

Phoenix pursuant to that certain Assignment and Assumption Agreement dated as of September 22, 2021 (the “Assignment”).²

2. The Proposed Phoenix Cure Amount set forth in Exhibit A to the Assumption Notice is \$2,111,285. The Proposed Phoenix Cure amount is incorrect. The actual Cure Amount under the Endicott Leases is \$2,836,806.55 (the “Phoenix Cure Amount”), as evidenced by the ledger attached hereto as **Exhibit “A.”**

3. Nothing in this Objection is intended to be, or should be construed as, a waiver by Phoenix of any of its rights under the Endicott Leases, the Bankruptcy Code, or applicable law. Phoenix expressly reserves all such rights, including, without limitation, the right to: (i) supplement and/or amend this Objection and to assert additional objections to the proposed assumption of the Endicott Leases on any and all grounds; (ii) amend the Phoenix Cure Amount; (iii) assert additional non-monetary defaults under the Endicott Leases; (iv) further object to any proposed assumption and/or assignment of the Endicott Leases, including any proffered adequate assurance of future performance under them; and (v) assert any further objections as it deems necessary or appropriate.

WHEREFORE, Phoenix respectfully requests that this Court enter an Order sustaining this Objection and granting relief consistent with this Objection, and granting such other and further relief as the Court deems just and proper.

Dated: March 14, 2025

² True and correct copies of the Endicott Leases and the Assignment may be provided upon request.

Respectfully submitted,

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**Application for admission pro hac vice pending*

*Attorneys for Phoenix Endicott Industrial Investors,
LLC*

Exhibit A

Tenant: Imperium3 New York (t0000440)
Property: Phoenix Endicott Industrial Investors LLC (09730001)
SPACES 048-IMP, 048, MAXI, 053-3, 087-1

Date	Charge Code	Description	Unit	Charge	Payment	Balance
5/22/2023	RENT	Flex Rent (8/1/22)	048-IMP	14,650.83	0.00	14,650.83
5/23/2023	RENT	Flex Rent (7/1/22)	048-IMP	14,650.83	0.00	29,301.66
5/24/2023	RENT	Flex Rent (6/1/22)	048-IMP	14,650.83	0.00	43,952.49
5/25/2023	RENT	Flex Rent (5/1/22)	048-IMP	15,667.90	0.00	59,620.39
5/26/2023	RENT	Flex Rent (4/1/22)	048-IMP	11,568.22	0.00	71,188.61
5/27/2023	RENT	Flex Rent (3/1/22)	048-IMP	5,656.34	0.00	76,844.95
5/28/2023	RENT	Flex Rent (2/1/22)	048-IMP	6,787.17	0.00	83,632.12
5/29/2023	RENT	Flex Rent (1/31/22)	048-IMP	7,261.41	0.00	90,893.53
5/30/2023	RENT	Flex Rent (12/31/21)	048-IMP	8,027.04	0.00	98,920.57
6/4/2023	RENT	Flex Rent (9/1/22)	048-IMP	14,650.83	0.00	113,571.40
6/5/2023	RENT	Flex Rent (10/1/22)	048-IMP	14,650.83	0.00	128,222.23
6/6/2023	RENT	Flex Rent (11/1/22)	048-IMP	14,650.83	0.00	142,873.06
6/7/2023	RENT	Flex Rent (12/1/22)	048-IMP	14,650.83	0.00	157,523.89
6/8/2023	RENT	Flex Rent (1/1/23)	048-IMP	14,650.83	0.00	172,174.72
6/9/2023	RENT	Flex Rent (2/1/23)	048-IMP	14,650.83	0.00	186,825.55
6/10/2023	RENT	Flex Rent (3/1/23)	048-IMP	14,650.83	0.00	201,476.38
6/11/2023	RENT	Flex Rent (4/1/23)	048-IMP	14,650.83	0.00	216,127.21
1/29/2024	UTIL	Utilities (Jun-Dec 2023)	048-IMP,048-MAXI,053-3,087-1	40,881.85	0.00	257,009.06
1/30/2024	UTIL	Utilities (01/2024)	048-IMP,048-MAXI,053-3,087-1	33,950.77	0.00	290,959.83
1/31/2024	UTIL	Utilities (Oct 2022-May 2023)	048-IMP,048-MAXI,053-3,087-1	452,403.05	0.00	743,362.88
3/1/2024	UTIL	Utilities (02/2024)	048-IMP,048-MAXI,053-3,087-1	61,895.41	0.00	805,258.29
3/15/2024	CAM	2023 CAM Reconciliation	048-IMP,048-MAXI,053-3,087-1	236,299.31	0.00	1,041,557.60
3/31/2024	UTIL	Utilities (03/2024)	048-IMP,048-MAXI,053-3,087-1	66,840.23	0.00	1,108,397.83
4/30/2024	UTIL	Utilities (04/2024)	048-IMP,048-MAXI,053-3,087-1	65,362.78	0.00	1,173,760.61
5/30/2024	RENT	Flex Rent (05/2023-05/2024)	048-IMP,048-MAXI,053-3,087-1	188,130.23	0.00	1,361,890.84
5/31/2024	UTIL	Utilities (05/2024)	048-IMP,048-MAXI,053-3,087-1	66,856.84	0.00	1,428,747.68
6/21/2024	RENT	Flex Rent (06/2024-07/2024)	048-IMP,048-MAXI,053-3,087-1	27,747.98	0.00	1,456,495.66
6/30/2024	UTIL	Utilities (06/2024)	048-IMP,048-MAXI,053-3,087-1	73,778.22	0.00	1,530,273.88
7/1/2024	CAM	CAM (07/2024)	048-IMP,048-MAXI,053-3,087-1	12,778.48	0.00	1,543,052.36
7/1/2024	CAM	CAM (07/2024)	048-IMP,048-MAXI,053-3,087-1	7,500.19	0.00	1,550,552.55
7/1/2024	CAM	CAM (07/2024)	048-IMP,048-MAXI,053-3,087-1	15,578.14	0.00	1,566,130.69
7/1/2024	CAM	CAM (07/2024)	048-IMP,048-MAXI,053-3,087-1	1,422.17	0.00	1,567,552.86

Tenant: Imperium3 New York (t0000440)
Property: Phoenix Endicott Industrial Investors LLC (09730001)
SPACES 048-IMP, 048, MAXI, 053-3, 087-1

Date	Charge Code	Description	Unit	Charge	Payment	Balance
7/1/2024	INS	Insurance (07/2024)	048-IMP,048- MAXI,053-3,087-1	600.64	0.00	1,568,153.50
7/1/2024	INS	Insurance (07/2024)	048-IMP,048- MAXI,053-3,087-1	352.54	0.00	1,568,506.04
7/1/2024	INS	Insurance (07/2024)	048-IMP,048- MAXI,053-3,087-1	732.23	0.00	1,569,238.27
7/1/2024	INS	Insurance (07/2024)	048-IMP,048- MAXI,053-3,087-1	66.85	0.00	1,569,305.12
7/1/2024	PTAX	Property Tax (07/2024)	048-IMP,048- MAXI,053-3,087-1	6,055.00	0.00	1,575,360.12
7/1/2024	PTAX	Property Tax (07/2024)	048-IMP,048- MAXI,053-3,087-1	3,553.92	0.00	1,578,914.04
7/1/2024	PTAX	Property Tax (07/2024)	048-IMP,048- MAXI,053-3,087-1	7,381.60	0.00	1,586,295.64
7/1/2024	PTAX	Property Tax (07/2024)	048-IMP,048- MAXI,053-3,087-1	673.89	0.00	1,586,969.53
7/1/2024	RENT	Rent (07/2024)	048-IMP,048- MAXI,053-3,087-1	34,534.97	0.00	1,621,504.50
7/1/2024	RENT	Rent (07/2024)	048-IMP,048- MAXI,053-3,087-1	20,269.92	0.00	1,641,774.42
7/1/2024	RENT	Rent (07/2024)	048-IMP,048- MAXI,053-3,087-1	42,101.32	0.00	1,683,875.74
7/1/2024	RENT	Rent (07/2024)	048-IMP,048- MAXI,053-3,087-1	3,843.55	0.00	1,687,719.29
7/22/2024	LATE	Late Fee (07/2024)	048-IMP,048- MAXI,053-3,087-1	8,373.42	0.00	1,696,092.71
8/1/2024	CAM	CAM (08/2024)	048-IMP,048- MAXI,053-3,087-1	12,778.48	0.00	1,708,871.19
8/1/2024	CAM	CAM (08/2024)	048-IMP,048- MAXI,053-3,087-1	7,500.19	0.00	1,716,371.38
8/1/2024	CAM	CAM (08/2024)	048-IMP,048- MAXI,053-3,087-1	15,578.14	0.00	1,731,949.52
8/1/2024	CAM	CAM (08/2024)	048-IMP,048- MAXI,053-3,087-1	1,422.17	0.00	1,733,371.69
8/1/2024	INS	Insurance (08/2024)	048-IMP,048- MAXI,053-3,087-1	600.64	0.00	1,733,972.33
8/1/2024	INS	Insurance (08/2024)	048-IMP,048- MAXI,053-3,087-1	352.54	0.00	1,734,324.87
8/1/2024	INS	Insurance (08/2024)	048-IMP,048- MAXI,053-3,087-1	732.23	0.00	1,735,057.10
8/1/2024	INS	Insurance (08/2024)	048-IMP,048- MAXI,053-3,087-1	66.85	0.00	1,735,123.95
8/1/2024	PTAX	Property Tax (08/2024)	048-IMP,048- MAXI,053-3,087-1	6,055.00	0.00	1,741,178.95
8/1/2024	PTAX	Property Tax (08/2024)	048-IMP,048- MAXI,053-3,087-1	3,553.92	0.00	1,744,732.87
8/1/2024	PTAX	Property Tax (08/2024)	048-IMP,048- MAXI,053-3,087-1	7,381.60	0.00	1,752,114.47
8/1/2024	PTAX	Property Tax (08/2024)	048-IMP,048- MAXI,053-3,087-1	673.89	0.00	1,752,788.36

Tenant: Imperium3 New York (t0000440)
Property: Phoenix Endicott Industrial Investors LLC (09730001)
SPACES 048-IMP, 048, MAXI, 053-3, 087-1

Date	Charge Code	Description	Unit	Charge	Payment	Balance
8/1/2024	RENT	Rent (08/2024)	048-IMP,048-	34,534.97	0.00	1,787,323.33
			MAXI,053-3,087-1			
8/1/2024	RENT	Rent (08/2024)	048-IMP,048-	20,269.92	0.00	1,807,593.25
			MAXI,053-3,087-1			
8/1/2024	RENT	Rent (08/2024)	048-IMP,048-	42,101.32	0.00	1,849,694.57
			MAXI,053-3,087-1			
8/1/2024	RENT	Rent (08/2024)	048-IMP,048-	3,843.55	0.00	1,853,538.12
			MAXI,053-3,087-1			
8/1/2024	RENT	Flex Rent (8/1/2024)	048-IMP	14,650.83	0.00	1,868,188.95
8/31/2024	UTIL	Utilities (08/2024)	048-IMP,048-	71,466.97	0.00	1,939,655.92
			MAXI,053-3,087-1			
9/1/2024	CAM	CAM (09/2024)	048-IMP,048-	12,778.48	0.00	1,952,434.40
			MAXI,053-3,087-1			
9/1/2024	CAM	CAM (09/2024)	048-IMP,048-	7,500.19	0.00	1,959,934.59
			MAXI,053-3,087-1			
9/1/2024	CAM	CAM (09/2024)	048-IMP,048-	15,578.14	0.00	1,975,512.73
			MAXI,053-3,087-1			
9/1/2024	CAM	CAM (09/2024)	048-IMP,048-	1,422.17	0.00	1,976,934.90
			MAXI,053-3,087-1			
9/1/2024	INS	Insurance (09/2024)	048-IMP,048-	600.64	0.00	1,977,535.54
			MAXI,053-3,087-1			
9/1/2024	INS	Insurance (09/2024)	048-IMP,048-	352.54	0.00	1,977,888.08
			MAXI,053-3,087-1			
9/1/2024	INS	Insurance (09/2024)	048-IMP,048-	732.23	0.00	1,978,620.31
			MAXI,053-3,087-1			
9/1/2024	INS	Insurance (09/2024)	048-IMP,048-	66.85	0.00	1,978,687.16
			MAXI,053-3,087-1			
9/1/2024	PTAX	Property Tax (09/2024)	048-IMP,048-	6,055.00	0.00	1,984,742.16
			MAXI,053-3,087-1			
9/1/2024	PTAX	Property Tax (09/2024)	048-IMP,048-	3,553.92	0.00	1,988,296.08
			MAXI,053-3,087-1			
9/1/2024	PTAX	Property Tax (09/2024)	048-IMP,048-	7,381.60	0.00	1,995,677.68
			MAXI,053-3,087-1			
9/1/2024	PTAX	Property Tax (09/2024)	048-IMP,048-	673.89	0.00	1,996,351.57
			MAXI,053-3,087-1			
9/1/2024	RENT	Rent (09/2024)	048-IMP,048-	34,534.97	0.00	2,030,886.54
			MAXI,053-3,087-1			
9/1/2024	RENT	Rent (09/2024)	048-IMP,048-	20,269.92	0.00	2,051,156.46
			MAXI,053-3,087-1			
9/1/2024	RENT	Rent (09/2024)	048-IMP,048-	42,101.32	0.00	2,093,257.78
			MAXI,053-3,087-1			
9/1/2024	RENT	Rent (09/2024)	048-IMP,048-	3,843.55	0.00	2,097,101.33
			MAXI,053-3,087-1			
9/1/2024	RENT	Flex Rent (9/1/2024)	048-IMP	14,650.83	0.00	2,111,752.16
9/17/2024	LATE	Late Fees (09/2024)	048-IMP,048-	84,499.52	0.00	2,196,251.68
			MAXI,053-3,087-1			
10/1/2024	CAM	CAM (10/2024)	048-IMP,048-	12,778.48	0.00	2,209,030.16
			MAXI,053-3,087-1			
10/1/2024	CAM	CAM (10/2024)	048-IMP,048-	7,500.19	0.00	2,216,530.35
			MAXI,053-3,087-1			

Tenant: Imperium3 New York (t0000440)
Property: Phoenix Endicott Industrial Investors LLC (09730001)
SPACES 048-IMP, 048, MAXI, 053-3, 087-1

Date	Charge Code	Description	Unit	Charge	Payment	Balance
10/1/2024	CAM	CAM (10/2024)	048-IMP,048-	15,578.14	0.00	2,232,108.49
			MAXI,053-3,087-1			
10/1/2024	CAM	CAM (10/2024)	048-IMP,048-	1,422.17	0.00	2,233,530.66
			MAXI,053-3,087-1			
10/1/2024	INS	Insurance (10/2024)	048-IMP,048-	600.64	0.00	2,234,131.30
			MAXI,053-3,087-1			
10/1/2024	INS	Insurance (10/2024)	048-IMP,048-	352.54	0.00	2,234,483.84
			MAXI,053-3,087-1			
10/1/2024	INS	Insurance (10/2024)	048-IMP,048-	732.23	0.00	2,235,216.07
			MAXI,053-3,087-1			
10/1/2024	INS	Insurance (10/2024)	048-IMP,048-	66.85	0.00	2,235,282.92
			MAXI,053-3,087-1			
10/1/2024	PTAX	Property Tax (10/2024)	048-IMP,048-	6,055.00	0.00	2,241,337.92
			MAXI,053-3,087-1			
10/1/2024	PTAX	Property Tax (10/2024)	048-IMP,048-	3,553.92	0.00	2,244,891.84
			MAXI,053-3,087-1			
10/1/2024	PTAX	Property Tax (10/2024)	048-IMP,048-	7,381.60	0.00	2,252,273.44
			MAXI,053-3,087-1			
10/1/2024	PTAX	Property Tax (10/2024)	048-IMP,048-	673.89	0.00	2,252,947.33
			MAXI,053-3,087-1			
10/1/2024	RENT	Rent (10/2024)	048-IMP,048-	34,534.97	0.00	2,287,482.30
			MAXI,053-3,087-1			
10/1/2024	RENT	Rent (10/2024)	048-IMP,048-	20,269.92	0.00	2,307,752.22
			MAXI,053-3,087-1			
10/1/2024	RENT	Rent (10/2024)	048-IMP,048-	42,101.32	0.00	2,349,853.54
			MAXI,053-3,087-1			
10/1/2024	RENT	Rent (10/2024)	048-IMP,048-	3,843.55	0.00	2,353,697.09
			MAXI,053-3,087-1			
10/1/2024	RENT	Flex Rent (10/1/2024)	048-IMP	14,650.83	0.00	2,368,347.92
10/11/2024	UTIL	Utilities (09/2024)	048-IMP,048-	67,545.94	0.00	2,435,893.86
			MAXI,053-3,087-1			
11/1/2024	CAM	CAM (11/2024)	048-IMP	12,778.48	0.00	2,448,672.34
11/1/2024	CAM	CAM (11/2024)	048-MAXI	7,500.19	0.00	2,456,172.53
11/1/2024	CAM	CAM (11/2024)	053-3	15,578.14	0.00	2,471,750.67
11/1/2024	CAM	CAM (11/2024)	087-1	1,422.17	0.00	2,473,172.84
11/1/2024	INS	Insurance (11/2024)	048-IMP	600.64	0.00	2,473,773.48
11/1/2024	INS	Insurance (11/2024)	048-MAXI	352.54	0.00	2,474,126.02
11/1/2024	INS	Insurance (11/2024)	053-3	732.23	0.00	2,474,858.25
11/1/2024	INS	Insurance (11/2024)	087-1	66.85	0.00	2,474,925.10
11/1/2024	PTAX	Property Tax (11/2024)	048-IMP	6,055.00	0.00	2,480,980.10
11/1/2024	PTAX	Property Tax (11/2024)	048-MAXI	3,553.92	0.00	2,484,534.02
11/1/2024	PTAX	Property Tax (11/2024)	053-3	7,381.60	0.00	2,491,915.62
11/1/2024	PTAX	Property Tax (11/2024)	087-1	673.89	0.00	2,492,589.51
11/1/2024	RENT	Rent (11/2024)	048-IMP	35,854.21	0.00	2,528,443.72
11/1/2024	RENT	Rent (11/2024)	048-MAXI	21,044.23	0.00	2,549,487.95
11/1/2024	RENT	Rent (11/2024)	053-3	43,709.59	0.00	2,593,197.54
11/1/2024	RENT	Rent (11/2024)	087-1	3,990.37	0.00	2,597,187.91

Tenant: Imperium3 New York (t0000440)
Property: Phoenix Endicott Industrial Investors LLC (09730001)
SPACES 048-IMP, 048, MAXI, 053-3, 087-1

Date	Charge Code	Description	Unit	Charge	Payment	Balance
11/1/2024	RENT	Flex Rent (11/1/2024)	048-IMP	14,650.83	0.00	2,611,838.74
11/4/2024		Chk# ACH		0.00	100,000.00	2,511,838.74
11/4/2024		Chk# ACH		0.00	71,466.97	2,440,371.77
12/1/2024	CAM	CAM (12/2024)	048-IMP	12,778.48	0.00	2,453,150.25
12/1/2024	CAM	CAM (12/2024)	048-MAXI	7,500.19	0.00	2,460,650.44
12/1/2024	CAM	CAM (12/2024)	053-3	15,578.14	0.00	2,476,228.58
12/1/2024	CAM	CAM (12/2024)	087-1	1,422.17	0.00	2,477,650.75
12/1/2024	INS	Insurance (12/2024)	048-IMP	600.64	0.00	2,478,251.39
12/1/2024	INS	Insurance (12/2024)	048-MAXI	352.54	0.00	2,478,603.93
12/1/2024	INS	Insurance (12/2024)	053-3	732.23	0.00	2,479,336.16
12/1/2024	INS	Insurance (12/2024)	087-1	66.85	0.00	2,479,403.01
12/1/2024	PTAX	Property Tax (12/2024)	048-IMP	6,055.00	0.00	2,485,458.01
12/1/2024	PTAX	Property Tax (12/2024)	048-MAXI	3,553.92	0.00	2,489,011.93
12/1/2024	PTAX	Property Tax (12/2024)	053-3	7,381.60	0.00	2,496,393.53
12/1/2024	PTAX	Property Tax (12/2024)	087-1	673.89	0.00	2,497,067.42
12/1/2024	RENT	Rent (12/2024)	048-IMP	35,854.21	0.00	2,532,921.63
12/1/2024	RENT	Rent (12/2024)	048-MAXI	21,044.23	0.00	2,553,965.86
12/1/2024	RENT	Rent (12/2024)	053-3	43,709.59	0.00	2,597,675.45
12/1/2024	RENT	Rent (12/2024)	087-1	3,990.37	0.00	2,601,665.82
12/1/2024	RENT	Flex Rent (12/1/2024)	048-IMP	14,650.83	0.00	2,616,316.65
12/1/2024	UTIL	Utilities (11/2024)	048-IMP,048-MAXI,053-3,087-1	55,164.13	0.00	2,671,480.78
12/27/2024		Chk# ACH		0.00	174,000.00	2,497,480.78
12/31/2024	UTIL	Utilities (12/2024)	048-IMP,048-MAXI,053-3,087-1	48,739.44	0.00	2,546,220.22
1/1/2025	CAM	CAM (01/2025)	048-IMP	12,778.48	0.00	2,558,998.70
1/1/2025	CAM	CAM (01/2025)	048-MAXI	7,500.19	0.00	2,566,498.89
1/1/2025	CAM	CAM (01/2025)	053-3	15,578.14	0.00	2,582,077.03
1/1/2025	CAM	CAM (01/2025)	087-1	1,422.17	0.00	2,583,499.20
1/1/2025	INS	Insurance (01/2025)	048-IMP	600.64	0.00	2,584,099.84
1/1/2025	INS	Insurance (01/2025)	048-MAXI	352.54	0.00	2,584,452.38
1/1/2025	INS	Insurance (01/2025)	053-3	732.23	0.00	2,585,184.61
1/1/2025	INS	Insurance (01/2025)	087-1	66.85	0.00	2,585,251.46
1/1/2025	PTAX	Property Tax (01/2025)	048-IMP	6,055.00	0.00	2,591,306.46
1/1/2025	PTAX	Property Tax (01/2025)	048-MAXI	3,553.92	0.00	2,594,860.38
1/1/2025	PTAX	Property Tax (01/2025)	053-3	7,381.60	0.00	2,602,241.98
1/1/2025	PTAX	Property Tax (01/2025)	087-1	673.89	0.00	2,602,915.87
1/1/2025	RENT	Rent (01/2025)	048-IMP	35,854.21	0.00	2,638,770.08
1/1/2025	RENT	Rent (01/2025)	048-MAXI	21,044.23	0.00	2,659,814.31
1/1/2025	RENT	Rent (01/2025)	053-3	43,709.59	0.00	2,703,523.90
1/1/2025	RENT	Rent (01/2025)	087-1	3,990.37	0.00	2,707,514.27
1/1/2025	RENT	Flex Rent (1/1/2025)	048-IMP	14,650.83	0.00	2,722,165.10

Tenant: Imperium3 New York (t0000440)
Property: Phoenix Endicott Industrial Investors LLC (09730001)
SPACES 048-IMP, 048, MAXI, 053-3, 087-1

Date	Charge Code	Description	Unit	Charge	Payment	Balance
1/17/2025		Chk# ACH		0.00	161,294.05	2,560,871.05
1/23/2025		Chk# ACH		0.00	61,895.41	2,498,975.64
2/1/2025	CAM	CAM (02/2025)	048-IMP	12,778.48	0.00	2,511,754.12
2/1/2025	CAM	CAM (02/2025)	048-MAXI	7,500.19	0.00	2,519,254.31
2/1/2025	CAM	CAM (02/2025)	053-3	15,578.14	0.00	2,534,832.45
2/1/2025	CAM	CAM (02/2025)	087-1	1,422.17	0.00	2,536,254.62
2/1/2025	INS	Insurance (02/2025)	048-IMP	600.64	0.00	2,536,855.26
2/1/2025	INS	Insurance (02/2025)	048-MAXI	352.54	0.00	2,537,207.80
2/1/2025	INS	Insurance (02/2025)	053-3	732.23	0.00	2,537,940.03
2/1/2025	INS	Insurance (02/2025)	087-1	66.85	0.00	2,538,006.88
2/1/2025	PTAX	Property Tax (02/2025)	048-IMP	6,055.00	0.00	2,544,061.88
2/1/2025	PTAX	Property Tax (02/2025)	048-MAXI	3,553.92	0.00	2,547,615.80
2/1/2025	PTAX	Property Tax (02/2025)	053-3	7,381.60	0.00	2,554,997.40
2/1/2025	PTAX	Property Tax (02/2025)	087-1	673.89	0.00	2,555,671.29
2/1/2025	RENT	Rent (02/2025)	048-IMP	35,854.21	0.00	2,591,525.50
2/1/2025	RENT	Rent (02/2025)	048-MAXI	21,044.23	0.00	2,612,569.73
2/1/2025	RENT	Rent (02/2025)	053-3	43,709.59	0.00	2,656,279.32
2/1/2025	RENT	Rent (02/2025)	087-1	3,990.37	0.00	2,660,269.69

Tenant: Imperium3 New York (t0000441)**Property: Phoenix Endicott Industrial Investors LLC (09730001)**

Date	Charge Code	Description	Unit	Charge	Payment	Balance
7/1/2024	RENT	Rent (07/2024)	257-IMP	10,023.02	0.00	10,023.02
8/1/2024	RENT	Rent (08/2024)	257-IMP	10,023.02	0.00	20,046.04
9/1/2024	RENT	Rent (09/2024)	257-IMP	10,023.02	0.00	30,069.06
10/1/2024	RENT	Rent (10/2024)	257-IMP	10,023.02	0.00	40,092.08
11/1/2024	RENT	Rent (11/2024)	257-IMP	10,023.02	0.00	50,115.10
11/18/2024	UTIL	Utilities (10/2024)	257-IMP	50,512.99	0.00	100,628.09
12/1/2024	RENT	Rent (12/2024)	257-IMP	10,023.02	0.00	110,651.11
12/23/2024		Chk# ACH		0.00	50,512.99	60,138.12
1/1/2025	RENT	Rent (01/2025)	257-IMP	10,023.02	0.00	70,161.14
1/17/2025		Chk# ACH		0.00	10,023.02	60,138.12
2/1/2025	RENT	Rent (02/2025)	257-IMP	10,023.02	0.00	70,161.14

Tenant: Imperium3 New York (t0000440)

Property: Phoenix Endicott Industrial Investors LLC (09730001)

Date	Charge Code	Charge	Payment	Balance
2/7/2025		0.00	161,294.05	2,569,136.78
2/25/2025	RENT	14,650.83	0.00	2,583,787.61
2/28/25	UTIL	43,213.30	0.00	2,627,000.91
3/1/2025	RENT	10,023.02	0.00	2,637,023.93
3/1/2025	RENT	161,294.05	0.00	2,798,317.98
3/1/2025	UTIL	38,488.57	0.00	2,836,806.55

CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2025, a true and correct copy of the *Objection to Cure Amount* was filed electronically through the Court's CM/ECF system and served electronically on all parties enlisted to receive service electronically.

/s/ Christopher P. Simon

Christopher P. Simon (No. 3697)