

**Fill in this information to identify the case:**

Debtor Russell Reid Waste Hauling and Disposal Service Co., Inc.

United States Bankruptcy Court for the: \_\_\_\_\_ District of New Jersey  
(State)

Case number 25-23629

## Modified Official Form 410

# Proof of Claim

04/25

**Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.**

**Fillers must leave out or redact** information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

## Part 1: Identify the Claim

1. Who is the current creditor?	George L. Miller, not individually, but as Chapter 7 Trustee of KDC Agribusiness LLC, et al.	
	Name of the current creditor (the person or entity to be paid for this claim)	
	Other names the creditor used with the debtor <u>See attached addendum</u>	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	See summary page	George L. Miller, Trustee 1628 John F. Kennedy Boulevard Suite 950 Philadelphia, PA 19103, USA
	Contact phone <u>302-442-7010</u>	Contact phone <u>215-561-0950</u>
	Contact email <u>kcapuzzi@beneschlaw.com</u>	Contact email <u>gmiller@mctllp.com</u>
	Uniform claim identifier (if you use one): _____	
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	



**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

6. Do you have any number you use to identify the debtor?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____
7. How much is the claim? \$ 243057.99	Does this amount include interest or other charges? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
8. What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.  <u>Avoidance action for transfers by KDC Agribusiness, LLC et al.</u>
9. Is all or part of the claim secured?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property.  <b>Nature or property:</b> <input type="checkbox"/> Real estate: If the claim is secured by the debtor's principle residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other. Describe: _____  <b>Basis for perfection:</b> _____ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)
	<b>Value of property:</b> \$ _____ <b>Amount of the claim that is secured:</b> \$ _____ <b>Amount of the claim that is unsecured:</b> \$ _____ (The sum of the secured and unsecured amount should match the amount in line 7.)
	<b>Amount necessary to cure any default as of the date of the petition:</b> \$ _____
	<b>Annual Interest Rate</b> (when case was filed) _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable
10. Is this claim based on a lease?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. <b>Amount necessary to cure any default as of the date of the petition.</b> \$ _____
11. Is this claim subject to a right of setoff?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____





# Verita (KCC) ePOC Electronic Claim Filing Summary

For phone assistance: Domestic (877) 634-7164 | International (424) 236-7220

<b>Debtor:</b> 25-23629 - Russell Reid Waste Hauling and Disposal Service Co., Inc.		
<b>District:</b> District of New Jersey, Trenton Division		
<b>Creditor:</b> George L. Miller, not individually, but as Chapter 7 Trustee of KDC Agribusiness LLC, et al. Kevin M. Capuzzi, Esq. 1313 N. Market Street Suite 1201 Wilmington, DE, 19801 USA <b>Phone:</b> 302-442-7010 <b>Phone 2:</b> <b>Fax:</b> 302-442-7012 <b>Email:</b> kcapuzzi@beneschlaw.com	<b>Has Supporting Documentation:</b> Yes, supporting documentation successfully uploaded	
	<b>Related Document Statement:</b>	
	<b>Has Related Claim:</b> No	
	<b>Related Claim Filed By:</b>	
	<b>Filing Party:</b> Creditor	
	<b>Disbursement/Notice Parties:</b> George L. Miller, Trustee 1628 John F. Kennedy Boulevard Suite 950 Philadelphia, PA, 19103 USA <b>Phone:</b> 215-561-0950 <b>Phone 2:</b> <b>Fax:</b> <b>E-mail:</b> gmiller@mctlp.com	
	<b>DISBURSEMENT ADDRESS</b>	
	<b>Other Names Used with Debtor:</b> See attached addendum	<b>Amends Claim:</b> No <b>Acquired Claim:</b> No
	<b>Basis of Claim:</b> Avoidance action for transfers by KDC Agribusiness, LLC et al.	<b>Last 4 Digits:</b> No
<b>Total Amount of Claim:</b> 243057.99	<b>Includes Interest or Charges:</b> No	
<b>Has Priority Claim:</b> No	<b>Priority Under:</b>	
<b>Has Secured Claim:</b> No	<b>Nature of Secured Amount:</b> <b>Value of Property:</b>	
<b>Amount of 503(b)(9):</b> No	<b>Annual Interest Rate:</b>	
<b>Based on Lease:</b> No	<b>Arrearage Amount:</b>	
<b>Subject to Right of Setoff:</b> No	<b>Basis for Perfection:</b> <b>Amount Unsecured:</b>	

**Submitted By:**

George L. Miller on 29-Jan-2026 3:39:29 p.m. Pacific Time

**Title:**

Trustee of KDC Agribusiness, LLC et al.

**Company:**

Fill in this information to identify the case:

Debtor 1 Russell Reid Waste Hauling & Disposal Service Co.

Debtor 2 \_\_\_\_\_  
(Spouse, if filing) \_\_\_\_\_

United States Bankruptcy Court for the: District of New Jersey

Case number 25-23629-MBK

## Official Form 410

### Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

#### Part 1: Identify the Claim

1. Who is the current creditor?	George L. Miller, not individually, but as Chapter 7 Trustee of KDC Agribusiness, LLC et al. Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor See addendum		
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____		
3. Where should notices and payments to the creditor be sent?  Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent?  Kevin M. Capuzzi, Esq. Name 1313 North Market Street, Suite 1201 Number Street Wilmington DE 19801 City State ZIP Code Contact phone (302) 442-7010 Contact email <a href="mailto:kcapuzzi@beneschlaw.com">kcapuzzi@beneschlaw.com</a>	Where should payments to the creditor be sent? (if different)  George L. Miller, Trustee Name 1628 John F. Kennedy Boulevard, Suite 950 Number Street Philadelphia PA 19103 City State ZIP Code Contact phone (215) 561-0950 Contact email <a href="mailto:gmiller@mctlp.com">gmiller@mctlp.com</a>	
Uniform claim identifier for electronic payments in chapter 13 (if you use one): -----			
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____/_____/_____		
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____		

**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

6. Do you have any number you use to identify the debtor?  No  Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: \_\_\_\_\_

7. How much is the claim? \$ 243,057.99. Does this amount include interest or other charges?  No  Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.  
  
Avoidance action for transfers by KDC Agribusiness, LLC et al.

9. Is all or part of the claim secured?  No  Yes. The claim is secured by a lien on property.  
**Nature of property:**  
 Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.  
 Motor vehicle  
 Other. Describe: \_\_\_\_\_

**Basis for perfection:** \_\_\_\_\_  
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

**Value of property:** \$ \_\_\_\_\_  
**Amount of the claim that is secured:** \$ \_\_\_\_\_  
**Amount of the claim that is unsecured:** \$ \_\_\_\_\_ (The sum of the secured and unsecured amounts should match the amount in line 7.)

**Amount necessary to cure any default as of the date of the petition:** \$ \_\_\_\_\_

**Annual Interest Rate (when case was filed)** \_\_\_\_\_ %  
 Fixed  
 Variable

10. Is this claim based on a lease?  No  Yes. Amount necessary to cure any default as of the date of the petition. \$ \_\_\_\_\_

11. Is this claim subject to a right of setoff?  No  Yes. Identify the property: \_\_\_\_\_

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?	<input checked="" type="checkbox"/> No	Amount entitled to priority
<input type="checkbox"/> Yes. Check one:		
<p><input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). \$ _____</p> <p><input type="checkbox"/> Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). \$ _____</p> <p><input type="checkbox"/> Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). \$ _____</p> <p><input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). \$ _____</p> <p><input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). \$ _____</p> <p><input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)(_____) that applies. \$ _____</p>		
<small>* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.</small>		

### Part 3: Sign Below

The person completing this proof of claim must sign and date it.  
FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.  
18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

I am the creditor.

I am the creditor's attorney or authorized agent.

I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 1 29 2026  
MM / DD / YYYY



Print the name of the person who is completing and signing this claim:

Name	George L. Miller		
	First name	Middle name	Last name
Title	Trustee of KDC Agribusiness, LLC et al.		
Company	Identify the corporate servicer as the company if the authorized agent is a servicer.		
Address	1628 John F. Kennedy Boulevard, Suite 950		
	Number	Street	
	Philadelphia		PA 19103
	City	State	ZIP Code
Contact phone	(215) 561-0950		Email <a href="mailto:gmliller@mctlp.com">gmliller@mctlp.com</a>

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**BENESCH FRIEDLANDER COPLAN  
& ARONOFF LLP**

Kevin M. Capuzzi (NJ No. 173442015)  
1313 North Market Street, Suite 1201  
Wilmington, DE 19801  
Telephone: (302) 442-7010  
Fax: (302) 442-7012  
Email: [kcapuzzi@beneschlaw.com](mailto:kcapuzzi@beneschlaw.com)

*Counsel for George L. Miller, not individually,  
but as Chapter 7 Trustee for KDC Agribusiness,  
LLC et al.*

In re:	Chapter 11
United Site Services, Inc., et al. <sup>1</sup>	Case No. 25-23630 (MBK)
Debtors.	(Jointly Administered)

**ADDENDUM TO PROOF OF CLAIM OF GEORGE L. MILLER,  
NOT INDIVIDUALLY, BUT AS CHAPTER 7 TRUSTEE  
OF KDC AGRIBUSINESS, LLC ET AL.**

George L. Miller, not individually, but as Chapter 7 Trustee for KDC Agribusiness, LLC et al. (“Claimant”), hereby submits this addendum to his proof of claim in the above-captioned jointly-administered Chapter 11 case (the “New Jersey Case”), and respectfully states as follows:

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<sup>1</sup> The last four digits of the tax identification number of United Site Services, Inc. are 3387. A complete list of the Debtors in these chapter 11 cases (the “Chapter 11 Cases”), with each one’s tax identification number, principal office address and former names and trade names, is available on the website of the Debtors’ noticing agent at [www.veritaglobal.net/USS](http://www.veritaglobal.net/USS). The location of the principal place of business of United Site Services, Inc., and the Debtors’ service address for these Chapter 11 Cases is 118 Flanders Road, Suite 1000, Westborough, MA 01581.

## I. Basis for Claim

1. Claimant is the Chapter 7 Trustee of KDC Agribusiness, LLC *et al.* (collectively, the “KDC Debtors”), whose bankruptcy cases are pending in the United States Bankruptcy Court for the District of Delaware (the “Delaware Court”), jointly administered in case no. 23-10786 (CTG) (the “Delaware Case”).

2. Prior to the filing of the KDC Debtors’ petitions for bankruptcy on June 16, 2023 (the “KDC Petition Date”), the KDC debtors were agricultural infrastructure companies, which regularly purchased goods and services from various entities.

3. Within ninety days before the KDC Petition Date, one or more of the KDC Debtors made transfers (the “Transfers”) to Russell Reid Waste Hauling and Disposal Co. (“Russell Reid”), a debtor in the New Jersey Case. The Transfers totaled not less than \$243,057.99. A summary of the Transfers is attached hereto as Exhibit A.

4. On the KDC Petition Date, the KDC Debtors filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code, thereby commencing the Delaware Case.

5. On November 30, 2023, the Delaware Court entered an order [Delaware Case D.I. 514] converting each of the KDC Debtors’ Chapter 11 cases to cases under Chapter 7 of Title 11 of the United States Code.

6. That same day, the United States Trustee for Regions 3 & 9 filed a notice [Delaware Case D.I. 515] appointing Claimant as the Chapter 7 Trustee of each of the KDC Debtors’ estates.

7. On May 12, 2025, Claimant, in his capacity as Chapter 7 Trustee for the KDC Debtors, initiated an adversary proceeding (the “Adversary Proceeding”) against Russell Reid in the Delaware Court, case no. 25-50941 (CTG). By the Adversary Proceeding, Claimant seeks to avoid all Transfers as preferential, fraudulent, and/or unauthorized post-petition transfers; to

recover all voided Transfers; and to disallow all claims by Russell Reid against the estates of the KDC Debtors until the Transfers are disgorged.

8. On or about December 29, 2025 (the “Petition Date”), Russell Reid, and all other debtors in the New Jersey Case, filed voluntary petitions for bankruptcy in the New Jersey Case.

9. The Adversary Proceeding remains pending in the Delaware Court. On January 7, 2025, counsel for Russell Reid filed a Suggestion of Bankruptcy [Adversary Proceeding D.I. 15] in the Adversary Proceeding. Pursuant to 11 U.S.C. § 362, Claimant has taken no action against Russell Reid, in the Adversary Proceeding or otherwise, since the Petition Date.

10. In total, the outstanding amounts due to Claimant from Russell Reid for the Transfers are not less than \$243,057.99.

11. Claimant hereby asserts a total unsecured claim against Russell Reid of no less than \$243,057.99 as of the Petition Date (the “Claim”).

## **II. Notices**

12. All notices concerning this Claim and/or any objections to this Claim should be served on the following:

Kevin M. Capuzzi, Esq.  
Jared C. Hoffman, Esq.  
Benesch, Friedlander, Coplan & Aronoff LLP  
1313 North Market Street, Suite 1201  
Wilmington, DE 19801  
Phone: (302) 442-7010  
Email: [kcapuzzi@beneschlaw.com](mailto:kcapuzzi@beneschlaw.com)  
[jhoffman@beneschlaw.com](mailto:jhoffman@beneschlaw.com)

13. This constitutes a request by Claimant pursuant to Fed. R. Bankr. P. 2002(g) to have notices delivered to the foregoing address.

### **III. Reservation of Rights**

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14. Claimant reserves the right to amend, supplement, or modify this proof of claim in any way for any reason as Claimant deems necessary or appropriate, including, without limitation, to increase the amounts described above or to include amounts not stated above, including, without limitation, on account of any costs, expenses, attorneys' fees, and other charges or amounts due, as may be appropriate under applicable bankruptcy and non-bankruptcy law or in equity.

15. Nothing herein is intended, or shall be deemed or construed, as any of the following: (a) a consent to the jurisdiction of the bankruptcy court for any purpose other than with respect to the adjudication of the claims specifically asserted in this proof of claim; (b) a consent to the jurisdiction of the bankruptcy court with respect to the adjudication of any claim or cause of action constituting a "Stern" claim that Claimant has the right to have adjudicated by a court established pursuant to Article III of the United States Constitution, regardless of whether such claim or cause of action is designated as a core proceedings or non-core proceeding in respect of this bankruptcy case; (c) a waiver of the right to have any and all final orders in non-core matters or proceedings, and any and all core matters or proceedings constituting "Stern" claims, entered only after *de novo* review by the United States District Court for this district; (d) a waiver or release of the right to a trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (e) a waiver or release of the right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; (f) an election of remedies; (g) an admission of personal jurisdiction; (h) a waiver or release of any applicable privilege; and (i) a waiver or release of any other right, claim, remedy, action, defense, setoff, or recoupment to which Claimant is or may be entitled under any agreements, in law, or in equity, all of which are expressly reserved.

# **EXHIBIT A**

**KDC Agribusiness LLC et al.**

**Bankruptcy Case 23-10786**

**Exhibit A**

<b>Debtor Transferor</b>	<b>Transferee</b>	<b>Transfer Date</b>	<b>Transfer Amount</b>
KDC Agribusiness Fairless Hills LLC	Russell Reid Inc	5/4/2023	\$ 20,724.00
KDC Agribusiness Fairless Hills LLC	Russell Reid Inc	5/16/2023	\$ 34,269.00
KDC Agribusiness Fairless Hills LLC	Russell Reid Inc	5/19/2023	\$ 16,998.00
KDC Agribusiness Fairless Hills LLC	Russell Reid Inc	5/25/2023	\$ 84,094.20
KDC Agribusiness Fairless Hills LLC	Russell Reid Inc	6/2/2023	\$ 63,116.79
KDC Agribusiness Fairless Hills LLC	Russell Reid Inc	6/15/2023	\$ 23,856.00
			<hr/> <u>\$ 243,057.99</u>