Case 25-23630-MBK Doc 19 Filed 12/20/25 Entered 13/20/25 04:42:31 Dock Main Docket #0019 Date Filed: 12/29/2025

Document

Page 1 of 10

MILBANK LLP

Dennis F. Dunne (*pro hac vice* pending) Samuel A. Khalil (*pro hac vice* pending) Matthew Brod (*pro hac vice* pending)

Lauren C. Doyle (*pro hac vice* pending) Benjamin M. Schak (*pro hac vice* pending)

55 Hudson Yards New York, NY 10001 Telephone: 1 (212) 530-5000 DDunne@Milbank.com

SKhalil@Milbank.com MBrod@Milbank.com LDoyle@Milbank.com BSchak@Milbank.com

Proposed Co-Counsel to the Debtors and Debtors in Possession

COLE SCHOTZ P.C.

Michael D. Sirota Felice R. Yudkin Daniel J. Harris

Court Plaza North, 25 Main Street

Hackensack, NJ 07601 Telephone: 1 (201) 489-3000 MSirota@coleschotz.com FYudkin@coleschotz.com DHarris@coleschotz.com

Proposed Co-Counsel to the Debtors and Debtors in Possession

# UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

In re

UNITED SITE SERVICES, INC. et al.,1

Debtors.

Case No. 25-[●] (●)

Chapter 11

(Joint Administration Requested)

# DEBTORS' APPLICATION FOR EXPEDITED CONSIDERATION OF FIRST DAY MATTERS

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. 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.



2523630251229000000000013

### TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

The above-captioned debtors and debtors in possession (the "**Debtors**") respectfully submit this application (the "**Application**") for expedited consideration of first day matters pursuant to Rule 9013-5 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey and respectfully request that a hearing on the following applications and motions be provided on an expedited basis:

Motion			
1.	Debtors' Motion for Entry of an Order Directing Joint		
	Administration of Chapter 11 Cases		
2.	Debtors' Application for Designation as Chapter 11		
	Complex Case		
3.	Application for an Order Authorizing Retention of		
	Claims and Noticing Agent for the Debtors under 28		
	U.S.C. § 156(c), 11 U.S.C. § 105(a) and General Order Governing Protocol for the Retention of Claims and		
	Noticing Agents under 28 U.S.C. § 156(c) Pending		
	Adoption of Local Rule		
1	Debtors' Motion for Entry of Interim and Final Orders		
4.	(I) Authorizing the Debtors to (A) Obtain Postpetition		
	Financing and (B) Use Cash Collateral, (II) Granting		
	Liens and Providing Superpriority Administrative		
	Expense Claims, (III) Granting Adequate Protection to		
	Prepetition Secured Parties, and (IV) Modifying the		
	Automatic Stay		
5.	Debtors' Motion for Entry of Interim and Final Orders		
	Authorizing the Debtors to (I) File a Consolidated Cred-		
	itor Matrix and Top 30 Creditors List and (II) Redact Cer-		
	tain Personally Identifiable Information		
6.	Debtors' Motion for Entry of Interim and Final Orders		
	(I) Prohibiting Utilities from Altering, Refusing or		
	Discontinuing Service, (II) Approving Adequate Assur-		
	ance of Payment to Utilities, (III) Establishing Procedures to Resolve Requests for Additional Assurance, and		
	(IV) Granting Related Relief		
	(1) Granding Related Rener		

	Motion				
7.	Debtors' Motion for Entry of Interim and Final Orders				
	(I) Authorizing the Debtors to (A) Maintain and Use				
	Their Existing Cash Management System, (B) Pay Bank				
	Fees and Processing Charges, (C) Maintain and Use				
	Credit Card Programs, (D) Engage in Intercompany				
	Transactions, and (E) Pay Certain Prepetition Amounts;				
	(II) Granting Administrative Expense Status to Postpeti-				
	tion Intercompany Claims; and (III) Waiving Certain U.S.				
	Trustee Operating Guidelines				
8.	Debtors' Motion for Entry of Interim and Final Orders				
	(A) Authorizing Them to Continue (I) Maintaining Their				
	Insurance Policies, Surety Bonds, and Premium Financing Agrangements and (II) Poving Insurance Obligations				
	ing Arrangements and (II) Paying Insurance Obligations, Including Those Incurred Prepetition; (B) Modifying the				
	Automatic Stay with Respect to Workers' Compensation				
	Claims; and (C) Granting Related Relief				
0	Debtors' Motion for Entry of Interim and Final Orders				
9.	Authorizing Them to Continue Customer Programs in the				
	Ordinary Course and Honor Related Prepetition Obliga-				
	tions				
10.	Debtors' Motion for Entry of Interim and Final Orders				
10.	Authorizing Payment of Certain Taxes and Fees				
11.	Debtors' Motion for Entry of Interim and Final Orders				
11.	Authorizing Them To (I) Pay Prepetition Employee Com-				
	pensation and Benefits and (II) Maintain Employee				
	Compensation and Benefit Programs				
12.	Debtors' Motion for Entry of Interim and Final Orders				
	(I) Authorizing Payment of Prepetition Trade Claims and				
	(II) Authorizing the Payment of and Confirming Admin-				
	istrative Expense Status of Outstanding Order Claims				
13.	Debtors' Motion for Entry of Order (I) Scheduling a				
	Combined Hearing to Approve the Disclosure Statement				
	and Confirm the Plan; (II) Establishing Objection Dead-				
	lines; (III) Approving the Form and Manner of Combined				
	Notice; (IV) Approving Solicitation Procedures and Ballots; (V) Approving Procedures for Assumption and				
	Rejection of Executory Contracts and Unexpired Leases;				
	(VI) Granting Preliminary Approval of Rights Offering				
	Procedures; and (VII) Granting Related Relief				
	1				

[Remainder of page intentionally blank]

Upon the foregoing Application, the Debtors respectfully request that the Court (a) enter an order, substantially in the form attached to the Application as **Exhibit A**, granting the Application, and (b) grant such other relief as is just and proper.

Dated: December 29, 2025 Respectfully submitted,

### /s/ Michael D. Sirota

## COLE SCHOTZ P.C.

Michael D. Sirota Felice R. Yudkin

Daniel J. Harris

Court Plaza North, 25 Main Street

Hackensack, NJ 07601

Telephone: 1 (201) 489-3000

MSirota@coleschotz.com

FYudkin@coleschotz.com

DHarris@coleschotz.com

- and -

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MBrod@Milbank.com

LDoyle@Milbank.com

BSchak@Milbank.com

Proposed Co-Counsel to the Debtors

# EXHIBIT A TO THE EXPEDITED CONSIDERATION APPLICATION

PROPOSED ORDER

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

In re

UNITED SITE SERVICES, INC. et al.,1

Debtors.

Case No. 25-[●] (●)

Chapter 11

(Joint Administration Requested)

# ORDER REGARDING DEBTORS' APPLICATION FOR EXPEDITED CONSIDERATION OF FIRST DAY MATTERS

The relief set forth on the following pages, numbered three (3) through five (5), is **ORDERED**.

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. 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.

## Caption in compliance with D.N.J. LBR 9004-1(b)

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Case 25-23630-MBK Doc 19 Filed 12/29/25 Entered 12/29/25 04:42:31 Desc Main Document Page 8 of 10

(Page 3)

Debtors: United Site Services, Inc. et al.

Case No.:  $25-[\bullet](\bullet)$ 

Caption of Order: Order Regarding Debtors' Application for

**Expedited Consideration of First Day Matters** 

After review of the *Debtors' Application for Expedited Consideration of First Day Matters*; it is hereby **ORDERED** that:

1. The Application is **GRANTED** as set forth herein.

2. The following applications and motions (collectively, the "**Motions**") are scheduled for hearing, to be conducted via Zoom, before the Honorable Michael B. Kaplan, at the date and time set forth below:

Motion		Hearing Date and Time
1.	Debtors' Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases	
2.	Debtors' Application for Designation as Chapter 11 Complex Case	
3.	Application for an Order Authorizing Retention of Claims and Noticing Agent for the Debtors under 28 U.S.C. § 156(c), 11 U.S.C. § 105(a) and General Order Governing Protocol for the Retention of Claims and Noticing Agents under 28 U.S.C. § 156(c) Pending Adoption of Local Rule	
4.	Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Superpriority Administrative Expense Claims, (III) Granting Adequate Protection to Prepetition Secured Parties, and (IV) Modifying the Automatic Stay	
5.	Debtors' Motion for Entry of Interim and Final Orders Authorizing the Debtors to (I) File a Consolidated Creditor Matrix and Top 30 Creditors List and (II) Redact Certain Personally Identifiable Information	
6.	Debtors' Motion for Entry of Interim and Final Orders (I) Prohibiting Utilities from Altering, Refusing or Discontinuing Service, (II) Approving Adequate Assurance of Payment to Utilities, (III) Establishing Procedures to Resolve Requests for Additional Assurance, and (IV) Granting Related Relief	

Case 25-23630-MBK Doc 19 Filed 12/29/25 Entered 12/29/25 04:42:31 Desc Main Document Page 9 of 10

(Page 4)

Debtors: United Site Services, Inc. et al.

Case No.: 25-[•] (•)

Caption of Order: Order Regarding Debtors' Application for Expedited Consideration of First Day Matters

Motion Hearing Date and Time				
		Treating Date and Time		
7.	Debtors' Motion for Entry of Interim and Final Orders			
	(I) Authorizing the Debtors to (A) Maintain and Use Their Existing Cash Management System, (B) Pay Bank			
	Fees and Processing Charges, (C) Maintain and Use			
	Credit Card Programs, (D) Engage in Intercompany			
	Transactions, and (E) Pay Certain Prepetition Amounts;			
	(II) Granting Administrative Expense Status to Postpeti-			
	tion Intercompany Claims; and (III) Waiving Certain U.S.			
	Trustee Operating Guidelines			
8.	Debtors' Motion for Entry of Interim and Final Orders			
	(A) Authorizing Them to Continue (I) Maintaining Their			
	Insurance Policies, Surety Bonds, and Premium Financ-			
	ing Arrangements and (II) Paying Insurance Obligations,			
	Including Those Incurred Prepetition; (B) Modifying the			
	Automatic Stay with Respect to Workers' Compensation			
	Claims; and (C) Granting Related Relief			
9.	Debtors' Motion for Entry of Interim and Final Orders			
	Authorizing Them to Continue Customer Programs in the			
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	istrative Expense Status of Outstanding Order Claims			
13.	Debtors' Motion for Entry of Order (I) Scheduling a			
13.	Combined Hearing to Approve the Disclosure Statement			
	and Confirm the Plan; (II) Establishing Objection Dead-			
	lines; (III) Approving the Form and Manner of Combined			
	Notice; (IV) Approving Solicitation Procedures and Bal-			
	lots; (V) Approving Procedures for Assumption and			
	Rejection of Executory Contracts and Unexpired Leases;			
	(VI) Granting Preliminary Approval of Rights Offering			
	Procedures; and (VII) Granting Related Relief			

3. A true copy of this Order shall be served in accordance with D.N.J. LBR 9013-5(f) and the *General Order Governing Chapter 11 Complex Case Procedures*.

Case 25-23630-MBK Doc 19 Filed 12/29/25 Entered 12/29/25 04:42:31 Desc Main Document Page 10 of 10

(Page 5)

Debtors: United Site Services, Inc. et al.

Case No.:  $25-[\bullet](\bullet)$ 

Caption of Order: Order Regarding Debtors' Application for Expedited Consideration of First Day Matters

4. Objections and/or responses to the Motions, if any, may be made at the hearing, under D.N.J. LBR 9013-5(d).

5. This Court retains jurisdiction over all matters arising from or related to the implementation, interpretation, or enforcement of this Order.