

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

*In re*

UNITED SITE SERVICES, INC. *et al.*,<sup>1</sup>  
Debtors.



Order Filed on January 29, 2026  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

Case No. 25-23630 (MBK)  
Chapter 11 (Jointly Administered)

**FINAL ORDER**  
**(A) AUTHORIZING DEBTORS TO**  
**CONTINUE (I) MAINTAINING THEIR**  
**INSURANCE POLICIES, SURETY BONDS, AND**  
**PREMIUM FINANCING 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**

The relief set forth on the following pages, numbered three (3) through eight (8), is  
**ORDERED.**

**DATED: January 29, 2026**

  
Honorable Michael B. Kaplan  
United States Bankruptcy Judge



252363026012900000000005

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

**MILBANK LLP**

Dennis F. Dunne (admitted *pro hac vice*)  
Samuel A. Khalil (admitted *pro hac vice*)  
Matthew Brod (admitted *pro hac vice*)  
Lauren C. Doyle (admitted *pro hac vice*)  
Benjamin M. Schak (admitted *pro hac vice*)  
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

- and -

**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

*Co-Counsel to the Debtors  
and Debtors in Possession*

(Page 3)

Debtors: United Site Services, Inc. *et al.*  
Case No.: 25-23630 (MBK)  
Caption of Order: Final Order  
(A) Authorizing Debtors to  
Continue (I) Maintaining Their  
Insurance Policies, Surety Bonds, and  
Premium Financing 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

---

Upon the motion (the “**Motion**”)<sup>1</sup> of the above-captioned debtors (collectively, the “**Debtors**”) for entry of a final order (this “**Final Order**”) (a) authorizing them to continue: (i) maintaining their existing insurance, surety bond, and premium financing programs, and (ii) pay all Insurance Obligations, whether incurred pre- or postpetition, (b) modifying the automatic stay to permit employees to proceed with workers’ compensation claims, and (c) granting related relief; and the Court having jurisdiction to decide the Motion and to enter this Final Order pursuant to 28 U.S.C. § 1334; and these Chapter 11 Cases having been referred to this Court by standing order of the U.S. District Court for the District of New Jersey; and consideration of the Motion being a core proceeding pursuant to 28 U.S.C. § 157(b) upon which this Court may enter a final order consistent with Article III of the U.S. Constitution; and venue being proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided, such that no other or further notice is required or necessary under the circumstances; and the Court having determined that the legal and factual bases set forth in the Motion and in the record establish just cause for entry of this Final Order; it is hereby **ORDERED** that:

1. The Motion is **GRANTED** on a final basis as set forth herein.
2. The Debtors shall serve a copy of the Motion and this Final Order on each affected counterparty listed on **Exhibit B** to the Motion and **Exhibits A and B** to this Final Order within two (2) business days after the date this Final Order is entered.

<sup>1</sup> Capitalized terms used but not defined herein have the meanings ascribed to them in the Motion.

(Page 4)

Debtors: United Site Services, Inc. *et al.*

Case No.: 25-23630 (MBK)

Caption of Order: **Error! Reference source not found.**

---

3. The Debtors are authorized, but not directed, on a final basis, to maintain, perform, and satisfy obligations under their Insurance Policies (including those listed on **Exhibit A** to this Final Order),<sup>2</sup> Premium Financing Arrangements, Surety Bonds, and Credit Support in the ordinary course and consistent with the practices and procedures that were in effect on the Petition Date.

4. The Debtors are authorized, but not directed, on a final basis, to honor their Insurance Obligations, including those incurred prior to or after the Petition Date in accordance with the same practices and procedures as were in effect on the Petition Date.

5. The Debtors are authorized, but not directed, on a final basis, to renew, supplement, modify, endorse, extend, reduce, purchase or enter into Insurance Policies, Surety Bonds, the Premium Financing Arrangements, and the Credit Support in the ordinary course of business, consistent with past practices; *provided* that to the extent the Debtors seek to enter into any new insurance premium financing agreements or provide additional credit support, other than as described in the Motion with respect to pending insurance renewals for 2026 as set forth on **Exhibit A** to this Final Order, the Debtors shall seek additional relief pursuant to section 364 of the Bankruptcy Code and approved by the Court; provided further that the Debtors shall provide five (5) calendar days' advance notice to counsel to the Ad Hoc Group, the U.S. Trustee and any official committee appointed in these cases of any modifications to the Insurance Policies, Surety Bonds, Premium Financing Arrangements, and Credit Support during the Chapter 11 Cases.

6. Except with respect to those policy renewals expressly described in the Motion for the 2026 policy period, the Debtors shall provide five (5) calendar days' advance notice to the Prepetition First-Out/Second-Out Agent, the ABL Agent, the U.S. Trustee and any official committee that may be appointed in these cases if the Debtors renew, supplement, modify, extend,

<sup>2</sup> For the avoidance of doubt, the term "Insurance Policies" shall include all insurance policies issued to or providing coverage to the Debtors, whether prospective, current or expired, including workers' compensation insurance policies, and any agreements related to any of the foregoing, whether or not listed in **Exhibit B** to the Motion or **Exhibit A** to this Final Order.

(Page 5)

Debtors: United Site Services, Inc. *et al.*

Case No.: 25-23630 (MBK)

Caption of Order: **Error! Reference source not found.**

---

endorse, reduce, increase or decrease existing insurance coverage, change Insurance Carriers<sup>3</sup> or obtain additional coverage in a manner that would be materially inconsistent with the Debtors' current insurance coverage.

7. The Debtors shall provide five (5) days' advance notice to the U.S. Trustee and any official committee that may be appointed in these cases with monthly reporting setting forth all payments on account of prepetition Insurance Obligations under this Final Order.

8. Subject to the terms and conditions of the orders of the Court approving the debtor in possession financing in these Chapter 11 Cases, the Debtors are authorized to pledge collateral to secure any renewed and new Premium Financing Arrangements and/or Credit Support in the ordinary course of business, to the extent described in the Motion.

9. The Debtors are authorized, but not directed, to pay Broker Fees and Agent Fees, whether incurred or due and payable before or after the Petition Date and shall provide five (5) calendar days' advance notice to the U.S. Trustee and any official committee that may be appointed in these cases if the Debtors amend, supplement, change, or enter into new brokerage or claims administration agreements in connection with any Insurance Policies in the ordinary course of the Debtors' business and consistent with past practices.

10. The automatic stay of Bankruptcy Code section 362(a), if and to the extent applicable, shall be deemed lifted without further order of the Court, solely to permit, on a final basis: (a) all current and former employees of the Debtors to proceed with workers' compensation claims in the appropriate judicial or administrative forum, provided that the recoveries on any such claims shall be limited to the proceeds of the Debtors' workers' compensation insurance; (b) the Debtors and their Insurance Carriers to take all steps necessary or appropriate with respect to the resolution of any workers' compensation claims and direct action claims, including by handling,

<sup>3</sup> For the avoidance of doubt, the term "Insurance Carrier" shall include any and all insurers that issued an Insurance Policy to the Debtors at any time, and any third-party administrators handling claims under any Insurance Policy, including any workers' compensation Insurance Carrier.

(Page 6)

Debtors: United Site Services, Inc. *et al.*

Case No.: 25-23630 (MBK)

Caption of Order: **Error! Reference source not found.**

---

defending, and/or settling any such claims without further notice or hearing; and (c) the Insurance Carriers to make payments on any such claims without further notice or hearing.

11. The Debtors are authorized, but not directed, on a final basis, to (a) continue maintaining the Surety Bonds consistent with their prepetition practices in the ordinary course of business; (b) in consultation with the Ad Hoc Group, renew, revise, amend, supplement, or extend the Surety Bonds or purchase new Surety Bonds, as needed; and (c) pay any amounts owed in connection with the Surety Bonds, including any prepetition amounts that may be outstanding with respect thereto.

12. Nothing herein or in the Motion (a) alters, amends or modifies the terms and conditions of the Insurance Policies including, but not limited to, (i) the obligation, if any, of any Insurance Carrier to pay any defense costs and any amounts within a deductible and the right, if any, of an Insurance Carrier to seek reimbursement from the Debtors therefor, and (ii) the obligation, if any, of the Debtors to reimburse any Insurance Carrier for defense costs and any amounts within a deductible, and (iii) the right, if any, of any Insurance Carrier to draw on and apply any collateral to the obligations, if any, under the Insurance Policies; (b) alters, amends, or modifies the Debtors' rights, obligations, or defenses under the Insurance Policies or applicable law; (c) precludes or limits, in any way, the rights of any Insurance Carrier to contest and/or litigate the existence, primacy and/or scope of available coverage under the Insurance Policies; or (d) waives any Insurance Carrier's claims or rights against the Debtors, any of the Debtors' subsidiaries or affiliates, or any other person, entity, property or parties liable to such Insurance Carrier (whether under the Insurance Policies or otherwise).

13. Nothing in the Motion or this Final Order or any actions taken by the Debtors pursuant to the relief granted by this Final Order is intended (and should not be construed) as: (a) an admission as to the amount of, basis for, priority, or validity of any particular claim under the Bankruptcy Code or applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type described in the Motion or any order

(Page 7)

Debtors: United Site Services, Inc. *et al.*

Case No.: 25-23630 (MBK)

Caption of Order: **Error! Reference source not found.**

---

granting the relief requested therein; (e) a request or authorization to assume, adopt, or reject any agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; (f) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on the property of, the Debtors' estates, and the Debtors expressly reserve their rights to contest the extent, validity, or perfection, or to seek avoidance of any and all liens, security interests, and other encumbrances; (g) a concession of any liability to any workers' compensation claimant; or (h) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

14. The banks and financial institutions on which checks were drawn or electronic payment requests made in payment of the Broker Fees and Agent Fees approved herein are authorized and directed, to receive, process, honor, and pay all such checks and electronic payment requests when presented for payment, and all such banks and financial institutions are authorized, but not directed, to rely on the Debtors' designation of any particular check or electronic payment request as approved by this Final Order.

15. Within two (2) business days of the entry of this Final Order, the Debtors shall serve a copy of this Final Order on each applicable bank and financial institution that is directed to comply with the terms of this Final Order.

16. The Debtors are authorized and directed, on a final basis, to issue or effectuate, as applicable, checks, wire transfers, ACH transfers, and other debits or electronic means, in replacement of any checks or fund transfer requests that are dishonored because of the filing of the Chapter 11 Cases with respect to prepetition amounts that are authorized to be paid under this Final Order or any other order of the Court.

17. Nothing in this Final Order authorizes the Debtors to accelerate any payments not otherwise due.

(Page 8)

Debtors: United Site Services, Inc. *et al.*

Case No.: 25-23630 (MBK)

Caption of Order: **Error! Reference source not found.**

---

18. Notwithstanding anything to the contrary in this Final Order, any payment made, or authorization contained, hereunder, shall be subject to the “Approved Budget” as defined in the orders of the Court approving the debtor-in-possession financing in these Chapter 11 Cases.

19. Notice of the Motion as described therein shall be deemed good and sufficient notice of the Motion and the relief requested therein, and satisfies the requirements of Bankruptcy Rules 4001(a)(1), 9014(a), and all other Bankruptcy Rules and Local Rules, except that the requirements of Bankruptcy Rule 9006(d) are waived with respect to entry of this Final Order on a final basis.

20. Notwithstanding Bankruptcy Rules 4001(a)(4), 6004(h), or any other provision of the Bankruptcy Rules or Local Rules, this Final Order shall be effective and enforceable immediately upon its entry.

21. The Debtors and their agents are authorized to take all steps necessary or appropriate to carry out this Final Order.

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

**EXHIBIT A TO INSURANCE ORDER**  
**AMENDED LIST OF 2026 INSURANCE POLICIES**

Type of Policy Coverage	Insurance Carrier(s)	Policy Term	Gross Annual Premium	Taxes & Fees
Commercial General Liability	Safety National	12/31/2025 - 12/31/2026	\$740,497	
Automobile Liability	Safety National	12/31/2025 - 12/31/2026	\$450,000	
Workers' Compensation Liability	Safety National	12/31/2025 - 12/31/2026	\$2,523,578	
Automobile Liability (1st Excess)	AXA XL	12/31/2025 - 12/31/2028	\$998,333	
Automobile Liability (2nd Excess)	Lexington	12/31/2025 - 12/31/2026	\$2,100,000	\$84,000
Automobile Liability (3rd Excess)	CoAction (Gotham Insurance Company)	12/31/2025 - 12/31/2026	\$1,250,000	\$50,000
Umbrella Liability (Primary)	AIG	12/31/2025 - 12/31/2026	\$2,600,000	\$104,000
Umbrella Liability (Excess #1)	Bowhead (Homesite Insurance Company)	12/31/2025 - 12/31/2026	\$1,650,000	\$67,000
Umbrella Liability (Excess #2)	AWAC	12/31/2025 - 12/31/2026	\$867,000	\$34,650
Umbrella Liability (Excess #3)	Travelers	12/31/2025 - 12/31/2026	\$714,432	\$28,865.96
Umbrella Liability (Excess #4)	Upland & Mitsui	12/31/2025 - 12/31/2026	\$570,000	\$22,572
Umbrella Liability (Excess #5)	Great American & Arch	12/31/2025 - 12/31/2026	\$826,000	\$16,520
Umbrella Liability (Excess #6)	Ascot	12/31/2025 - 12/31/2026	\$275,000	\$11,000

**EXHIBIT B TO INSURANCE ORDER**

**AMENDED LIST OF SURETY BONDS**

<b>Bond #</b>	<b>Type of Bond</b>	<b>Issuer</b>	<b>Obligee</b>	<b>Policy Term</b>	<b>Approximate Bond Amount</b>	<b>Approximate Bond Premium</b>
7901057307	Disposal Related Bond	Nationwide	Township of Ocean Sewerage Authority	10/13/2025 - 10/13/2026	\$ 791,400	\$ 11,871
4004132	Disposal Related Bond	Nationwide	New Jersey Turnpike Authority	1/23/2025 - 1/22/2026	\$ 20,810	\$ 312
7901057310	Contract / Transportation Related Bond	Nationwide	Township of Chatham	12/1/2024 - 11/30/2027	\$ 519,640	\$ 23,384
7901116788	Disposal Related Bond	Nationwide	City of London, OH	12/13/2024 - 12/12/2026	\$ 5,000	\$ 200
7901127551	Contractor Related Bond	Nationwide	Suffolk County - Dept. of Consumer Affairs - Septic Industry	2/10/2025 - 2/9/2026	\$ 10,000	\$ 150
7901116799	Contractor Related Bond	Nationwide	Suffolk County - Dept. of Consumer Affairs - Septic Industry	1/25/2025 - 1/24/2026	\$ 10,000	\$ 150
7901094050	Commercial Hauler Bond	Nationwide	Nashville and Davidson County - Dept. of Water Services	8/2/2025 - 8/2/2026	\$ 10,000	\$ 150
7901116798	Utility Related Bond	Nationwide	Orange County Utilities	1/12/2025 - 1/11/2026	\$ 30,000	\$ 450
7901094048	Disposal Related Bond	Nationwide	County of San Bernardino	8/1/2025 - 7/31/2026	\$ 8,500	\$ 128
0260716	Commercial Hauler Bond	Berkley	State of Delaware Department of Natural Resources and Environmental Controls	5/29/2024 - 5/29/2026	\$ 5,000	\$ 100

Bond #	Type of Bond	Issuer	Obligee	Policy Term	Approximate Bond Amount	Approximate Bond Premium
0260708	Commercial Hauler Bond	Berkley	Berkeley County Waste and Sanitation	4/16/2024 - 4/16/2026	\$ 80,000	\$ 1,162
0260709	Commercial Hauler Bond	Berkley	Berkeley County Waste and Sanitation	4/16/2024 - 4/16/2026	\$ 40,000	\$ 600
0260715	Waste Related Bond	Berkley	St Johns County	5/27/2024 - 5/27/2026	\$ 25,000	\$ 375
0266267	Contractor Related Bond	Berkley	State of Washington	1/4/2025 - 1/1/2026	\$ 30,000	\$ 450
0260717	License / Permit Related Bond	Berkley	New York State Dept of Environmental Conservation	4/25/2024 - 4/25/2026	\$ 50,000	\$ 750
0257112	Franchise Related Bond	Berkley	City of Jacksonville, FL	11/16/2025 - 11/15/2027	\$ 25,000	\$ 375
0257608	Guarantee Related Bond	Berkley	Construction Contractors Board of the State of Oregon	11/19/2025 - 11/19/2027	\$ 30,000	\$ 450
0267701	Contractor Bond	Berkley	New Jersey Division of Consumer Affairs	3/3/2025 - 3/3/2026	\$ 10,000	\$ 150
0259539	Disposal Related Bond	Berkley	City of Jacksonville, FL	3/18/2024 - 3/18/2026	\$ 1,800	\$ 100
0267718	License / Permit Related Bond	Berkley	City of Tualatin	3/24/2025 - 3/24/2026	\$ 72,278	\$ 1,084
0257129	Commercial Hauler Bond	Berkley	Salt Lake County Health Dept	11/18/2025 - 11/18/2027	\$ 13,000	\$ 195
0258367	License / Permit Related Bond	Berkley	Metro Wastewater Reclamation District	1/29/2024 - 1/29/2026	\$ 40,000	\$ 600
0257126	License / Permit Related Bond	Berkley	County of Sonoma Department of Health Services	1/1/2024 - 12/31/2025	\$ 1,000	\$ 100

Bond #	Type of Bond	Issuer	Obligee	Policy Term	Approximate Bond Amount	Approximate Bond Premium
0264753	License / Permit Related Bond	Berkley	Westmoreland County	4/1/2024 - 3/31/2026	\$ 10,088	\$ 151
0257128	License / Permit Related Bond	Berkley	San Juan County	1/1/2024 - 12/31/2025	\$ 1,000	\$ 100
0264730	License / Permit Related Bond	Berkley	Alabama Onsite Wastewater Board	10/16/2025 - 10/16/2026	\$ 15,000	\$ 225
0257606	License / Permit Related Bond	Berkley	City of Green	11/18/2025 - 11/18/2027	\$ 500	\$ 100
0257110	Commercial Hauler Bond	Berkley	Town of Merrimack	11/16/2025 - 11/16/2027	\$ 1,000	\$ 100
0266245	License / Permit Related Bond	Berkley	Septic Industry County of Suffolk Dept of Consumer Affairs	11/27/2025 - 11/27/2026	\$ 10,000	\$ 150
0266244	License / Permit Related Bond	Berkley	Septic Industry County of Suffolk Dept of Consumer Affairs	11/27/2025 - 11/27/2026	\$ 10,000	\$ 150
0257127	Septic Tank Pumpers Bond	Berkley	Island County Board of Health Department	11/17/2023 - 12/31/2025	\$ 2,000	\$ 100
0257113	License / Permit Related Bond	Berkley	County of Loudoun	11/15/2025 - 11/15/2027	\$ 10,000	\$ 150
0257111	Sewage Disposal Service Bond	Berkley	State of Oregon Water Quality Division	11/9/2025 - 11/9/2027	\$ 15,000	\$ 225
0257605	License / Permit Related Bond	Berkley	East Windsor Municipal Utilities Authority	12/1/2025 - 12/1/2027	\$ 20,000	\$ 300
0266254	License / Permit Related Bond	Berkley	Borough of Roosevelt	1/1/2025 - 12/31/2026	\$ 33,790	\$ 1,014

Bond #	Type of Bond	Issuer	Obligee	Policy Term	Approximate Bond Amount	Approximate Bond Premium
0258372	Street Excavation Bond	Berkley	City and County of San Francisco	2/9/2024 - 2/9/2026	\$ 25,000	\$ 375
0258355	Utility Related Bond	Berkley	Orange County Utilities Department	12/19/2023 - 12/19/2025	\$ 30,000	\$ 450
0258370	License / Permit Related Bond	Berkley	Plaquemine Parish Government	2/1/2024 - 2/1/2026	\$ 1,500	\$ 100
0258368	Commercial Hauler Bond	Berkley	County of Napa, CA	2/11/2024 - 2/11/2026	\$ 5,000	\$ 100
810028366	Disposal Related Bond	ASIC	City of Jacksonville	8/1/2025 – 8/1/2026	\$20,000	\$ 200
800206388	Disposal Related Bond	ASIC	Clay County Board of County Commissioners	10/1/2025 - 9/30/2026	\$500,040	\$15,001
800296400	License / Permit Related Bond	ASIC	State of Washington	6/1/2025 – 6/1/2026	\$30,000	\$ 900
800206390	Workers' Compensation Bond	ASIC	State of Wyoming	N/A (subject to term of employment)	\$8,000	\$ 240
800206386	Commercial Hauler Bond	ASIC	Raritan Township Municipal Utilities Authority	1/1/2026 - 12/31/2027	\$291,170	\$ 8,735