

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

In re

UNITED SITE SERVICES, INC. *et al.*,¹
Debtors.

Case No. 25-23630 (MBK)

Chapter 11

(Jointly Administered)

**DECLARATION IN SUPPORT OF EMPLOYMENT OF
McCARTER & ENGLISH, LLP AS PROFESSIONAL
UTILIZED IN THE ORDINARY COURSE OF BUSINESS**

I, David M. Ianelli, Esq., pursuant to 28 U.S.C. § 1746, hereby declare that the following is true to the best of my knowledge, information, and belief.

1. I am a Partner of McCarter & English, LLP, located at 265 Franklin Street, Boston, Massachusetts, 02110 (the “**Company**”).

2. United Site Services, Inc. and its affiliated debtors and debtors in possession (collectively, the “**Debtors**”) have requested that the Company provide legal services to the Debtors, and the Company has consented to provide such services.

3. The Company may have in the past performed and may in the future perform services, in matters unrelated to the Debtors’ Chapter 11 Cases, for persons that are parties in interest in these cases. As part of its customary practice, the Company is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants, employees of the Debtors, or other parties-in-interest in these cases. The Company does not perform services for any such persons in connection with these cases. In addition, the

¹ 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.



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Company does not have any relationship with any such persons, their attorneys, or accountants that would be adverse to the Debtors or their estates.²

4. Neither I, nor any principal of or professional employed by the Company has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principals and regular employees of the Company.

5. Neither I, nor any principal of, or professional employed by the Company, insofar as I have been able to discover, holds or represents any interest adverse to the Debtors or their estates.

6. The Company believes that it is owed approximately \$366,496.76 on account of services rendered and expenses incurred prior to the Petition Date in connection with the Company's employment by the Debtors, the payment of which is subject to limitations contained in title 11 of the United States Code.

7. As of the date on which the Debtors commenced these Chapter 11 Cases, the Company was not party to an agreement for indemnification with the Debtors.

8. As of the date on which the Debtors commenced these Chapter 11 Cases, the Company was not party to an agreement that contains dispute resolution language.

9. The Company does not expect to use independent contractors or subcontractors in connection with providing services to the Debtors.

10. At any time during the period of its employment, if the Company discovers any facts bearing on the matters described herein, the Company will supplement the information contained in this Declaration.

² The Firm's process of ascertaining whether it holds or represents an interest adverse to the Debtor or its estate with respect to matters on which the Firm is to be retained consisted of the running conflict of interest checks, in accordance with the standard practices of McCarter & English, LLP, on all potential parties in interest as identified by the Debtors (the "**Potential Conflict Parties**"). The attached **Exhibit 1** includes any Potential Conflict Parties which appeared on the results as current clients of the Firm or past clients of the Firm at any time in the past 3 years. The Firm will conduct further inquiries regarding its retention by any parties in interest in the Chapter 11 Case as needed, and, upon conclusion of such inquiries, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

11. I, or a representative of the Company, have read and am familiar with the requirements of the *Order (I) Authorizing Employment and Payment of Professionals Utilized in the Ordinary Course of Business and (II) Granting Related Relief*.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 10, 2026

/s/ David M. Ianelli
David M. Ianelli, Esq.

Exhibit 1

Name	Relationship
AMERICAN ELECTRIC POWER	Prior to the Petition Date, American Electric Power was a client in matters unrelated to this Chapter 11 Case.
APOLLO	Apollo is a current client in matters unrelated to this Chapter 11 Case.
ARENTFOX SCHIFF LLP	Arentfox Schiff LLP is a current client in matters unrelated to this Chapter 11 Case.
ASSURANT	Assurant is a current client in matters unrelated to this Chapter 11 Case.
AT&T	AT&T is a current client in matters unrelated to this Chapter 11 Case.
AT&T GLOBAL SERVICES	AT&T Global Services is a current client in matters unrelated to this Chapter 11 Case.
ATLANTIC CITY ELECTRIC	Atlantic City Electric is a current client in matters unrelated to this Chapter 11 Case.
AXA	AXA is a current client in matters unrelated to this Chapter 11 Case.
AXIS	Axis is a current client in matters unrelated to this Chapter 11 Case.
BANK OF AMERICA, N.A.	Bank of America, N.A. is a current client in matters unrelated to this Chapter 11 Case.
BARCLAYS	Barclays is a current client in matters unrelated to this Chapter 11 Case.
BGE BALTIMORE GAS & ELECTRIC	BGE Baltimore Gas & Electric is a current client in matters unrelated to this Chapter 11 Case.
BLACKSTONE	Blackstone is a current client in matters unrelated to this Chapter 11 Case.

CHUBB

Chubb is a current client in matters unrelated to this Chapter 11 Case.

CITI BANK, N.A.

Citi Bank, N.A. is a current client in matters unrelated to this Chapter 11 Case.

CITY OF MONROE, NORTH CAROLINA

City of Monroe, North Carolina is a current client in matters unrelated to this Chapter 11 Case.

COLE SCHOTZ P.C.

Cole Schotz P.C. is a current client in matters unrelated to this Chapter 11 Case.

COMCAST

COMCAST is a current client in matters unrelated to this Chapter 11 Case.

COMERICA BANK & TRUST, N.A.

Comerica Bank is a current client in matters unrelated to this Chapter 11 Case.

CONEDISON
CONSTELLATION NEWENERGY

Conedison is a current client in matters unrelated to this Chapter 11 Case.

Prior to the Petition Date, Constellation Newenergy was a client in matters unrelated to this Chapter 11 Case.

Delta Dental

Delta Dental is is a current client in matters unrelated to this Chapter 11 Case.

ELLIOTT MANAGEMENT

Elliott Management is a current client in matters unrelated to this Chapter 11 Case.

EVERSOURCE ENERGY

Eversource Energy is a current client in matters unrelated to this Chapter 11 Case.

GREENBERG TRAURIG, LLP

Greenberg Traurig, LLP is a current client in matters unrelated to this Chapter 11 Case.

HARTFORD FIRE INSURANCE COMPANY

Hartford Fire Insurance Company is a current client in matters unrelated to this Chapter 11 Case.

HBSC

HBSC is a current client in matters unrelated to this Chapter 11 Case.

HUNTSVILLE UTILITIES

Huntsville Utilities is a current client in matters unrelated to this Chapter 11 Case.

JP MORGAN CHASE & CO

JP Morgan Chase & Co is a current client in matters unrelated to this Chapter 11 Case.

M&T BANK

M&T Bank is a current client in matters unrelated to this Chapter 11 Case.

NEW JERSEY AMERICAN WATER COMPANY

New Jersey American Water Company is a current client in matters unrelated to this Chapter 11 Case.

NEW YORK LIFE

New York Life is a current client in matters unrelated to this Chapter 11 Case.

NJ NATURAL GAS CO

NJ Natural Gas Co is a current client in matters unrelated to this Chapter 11 Case.

NUMERA

Numera is a current client in matters unrelated to this Chapter 11 Case.

ORLANDO UTILITIES COMMISSION

Prior to the Petition Date, Orlando Utilities Commission was a client in matters unrelated to this Chapter 11 Case.

PECO

PECO is a current client in matters unrelated to this Chapter 11 Case.

PSEG & CO

Prior to the Petition Date, PSEG & Co was a client in matters unrelated to this Chapter 11 Case.

SCULPTOR

Sculptor is a current client in matters unrelated to this Chapter 11 Case. Southern California Edison is a current client in matters unrelated to this Chapter 11 Case.

SOUTHERN CALIFORNIA EDISON

SPIRE

SPIRE is a current client in matters unrelated to this Chapter 11 Case.

TUCSON ELECTRIC POWER

Prior to the Petition Date, Tucson Electric Power was a client in matters unrelated to this Chapter 11 Case.

UNITED RENTALS

United Rentals is a current client in matters unrelated to this Chapter 11 Case.

VERIZON

Verizon is a current client in matters unrelated to this Chapter 11 Case.

VOYAGER

VOYAGER is a current client in matters unrelated to this Chapter 11 Case. Wilmington Savings Fund Society is a current client in matters unrelated to this Chapter 11 Case.

Wilmington Savings Fund Society

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RETENTION QUESTIONNAIRE

To be completed by each Ordinary Course Professional employed by the Debtors and returned to:

MILBANK LLP

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

*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*

If more space is needed, please complete on a separate page and attach.

¹ 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.

1. Name and address of firm:

McCarter & English, LLP

2. Date of retention:

January 10, 2020

3. Type of services provided (accounting, legal, etc.):

Legal

4. Brief description of services to be provided:

McCarter provides USS with a variety of legal services relating to issues that arise routinely in the ordinary course of its business.

5. Arrangements for compensation (hourly, contingent, etc.):

McCarter is compensated by agreed-upon hourly rates for various legal services rendered on a monthly basis.

(a) Average hourly rate (if applicable):

For Automobile/Premises Liability Defensive Litigation matters, the average hourly rate is \$450 for partners, \$375 for associates.

For all other legal services provided to Debtor the average hourly rate is \$833.00.

(b) Estimated average monthly compensation (based on prepetition retention if the firm was employed prepetition):

McCarter billed Debtor a monthly average of \$133,819 for the three months preceding the filing of the bankruptcy petition in this matter (October 1, 2025 - December 28, 2025).

6. Prepetition claims against or interests in the Debtors held by the firm (if any):

\$366,496.76

7. Prepetition claims against or interests in the Debtors held individually by any member, associate, or professional employee of the firm:

None²

8. Nature and description of any interest adverse to the Debtors or to their estates with respect to the matters on which the above-named firm is to be employed:

None

9. Name and title of individual completing this Retention Questionnaire:

David M. Ianelli

² The Firm is not aware of any such claims or interests at this time. The Firm will conduct further inquiries as to whether any of its partners, associates or professional employees possess such a claim or interest and, upon conclusion of such inquiries, will supplement its response if it should discover any facts bearing upon the same.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 10, 2026

/s/ David M. Ianelli

David M. Ianelli, Esq.