

25-23630-MBK-398
 JESS MCNABB
 v.
 UNITED SITE SERVICES, INC.,
 LAUREN BIELSKIE, Chapter 11 Trustee
 DEBTS
 JESS MCNABB

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

IN RE:)	
)	
UNITED SITE SERVICES, INC.,)	CASE NO.: 25-23630-MBK
)	
Debtor.)	CHAPTER 11
_____)	
)	
JESS MCNABB,)	
)	
Movant,)	CONTESTED MATTER
v.)	
)	
UNITED SITE SERVICES, INC., and)	
LAUREN BIELSKIE, Chapter 11)	
Trustee,)	
)	
Respondents.)	
_____)	

**JESS MCNABB'S NOTICE OF WITHDRAWING MOTION FOR RELIEF
 FROM AUTOMATIC STAY AND WAIVER OF RIGHT TO HEARING
 WITHIN 30 DAYS AS PROVIDED BY 11 USC § 362(e)**

COMES NOW, Jess McNabb ("Movant"), by and through undersigned counsel, and respectfully moves this Honorable Court for entry of an Order permitting Movant to withdraw its previously filed Motion for Relief from Automatic Stay, and in support thereof states as follows:

1.

On February 4, 2026, Movant filed its Motion for Relief from Automatic Stay seeking relief from automatic stay and waiver of right to a hearing within 30 days as provided by 11 USC § 362(e).



2.

Movant no longer seeks the relief requested in the Stay Relief Motion.

4.

No order granting the Stay Relief Motion has been entered.

5.

Withdrawal of the Stay Relief Motion will not prejudice the Debtor, the Trustee, or any party in interest.

6.

Movant hereby waives any right to a hearing on this Motion and respectfully requests that the Court enter the attached Order without further notice or hearing.

WHEREFORE, Movant respectfully requests that this Court enter an Order permitting withdrawal of the Stay Relief Motion and granting such other and further relief as the Court deems just and proper.

Respectfully submitted this 5th day of March, 2026.

Kenneth S. Nugent, P.C.

By: /s/ Michael H. Ruder
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

IN RE:)
)
UNITED SITE SERVICES, INC.) CHAPTER 11
)
DEBTOR.) CASE NO.: 25-23630-MBK

ORDER

This matter having come before the Court upon the Notice of Withdrawal filed by Jess McNabb, by and through undersigned counsel, seeking to withdraw its Motion for Relief from the Automatic Stay previously filed on February 4, 2026, pursuant to 11 USC § 362(e) and the Court having considered the submission and for good cause shown, it is hereby ORDERED that the Motion for Relief from the Automatic Stay filed by Jess McNabb on February 4, 2026 is hereby WITHDRAWN; and it is further ORDERED that any hearing scheduled in connection with the Motion is cancelled.

SO ORDERED this _____ day of _____, 2026.

Michael B. Kaplan, Judge
United States Bankruptcy Court
District of New Jersey

Prepared by:
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FILED
JEANNE A. NAUGHTON, CLERK

MAR 12 2026

U.S. BANKRUPTCY COURT
NEWARK, N.J.
BY Robert [Signature] DEPUTY

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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Trustee,)	
)	
Respondents.)	
_____)	

CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing **JESS MCNABB'S NOTICE OF WITHDRAWING MOTION FOR RELIEF FROM AUTOMATIC STAY AND WAIVER OF RIGHT TO HEARING WITHIN 30 DAYS AS PROVIDED BY 11 USC § 362(e)** using the Bankruptcy Court's Electronic Case Filing program, which sends notice of the Document and an accompanying link to the Document to the following parties:

- Lauren Bielskie, U.S. Trustee USTP.Region03@usdoj.gov
- Michael D. Sirota msirota@coleschotz.com

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/s/ Michael H. Ruder

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