

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
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D.N.J. LBRE 9004-1

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

IN RE

CHAPTER 11

UNITED SITE SERVICES, INC. ET AL.

CASE NO. 25-23630 (MBK)

DEBTORS

Hearing Date: March 26, 2026

Judge: Honorable Michael B. Kaplan

ALLSTATE PROPERTY INSURANCE AND
CASUALTY INSURANCE COMPANY

Movant,

CONTESTED MATTER

v.

UNITED SITE SERVICES, INC. ET AL.

Respondents.

**ALLSTATE PROPERTY INSURANCE AND CASUALTY INSURANCE COMPANY'S
NOTICE OF WITHDRAWAL MOTION FOR RELIEF FROM AUTOMATIC STAY**

COMES NOW, Allstate Property Insurance and Casualty Insurance Company (“Movant”),
by and through the 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 27, 2026, Movant filed its Motion for Relief from Automatic Stay seeking relief from the Automatic Stay in Movant's action in United States District Court for the Eastern District of Pennsylvania under Case No: 2:25-cv-00855.

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

3. Movant understands that the Stay has been lifted by the Court.

4. No Order granting the Stay Relief Motion has been entered.

5. Withdraw 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 the withdraw of the Stay Relief Motion and granting such other and further relief as the Court deems just and proper.

Respectfully submitted this 17th day of March, 2026.

de LUCA LEVINE LLC

BY: /s/ Steven J. Payne
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Dated: March 17, 2026

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

IN RE

CHAPTER 11

UNITED SITE SERVICES, INC. ET AL.

CASE NO. 25-23630 (MBK)

DEBTORS

ORDER

This matter having come before the Court upon the Notice of Withdraw filed by Allstate Property Insurance and Casualty Insurance Company, by and through the undersigned counsel, seeking to withdraw its Motion for Relief from Automatic Stay previously filed on February 27, 2026, 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 Allstate Property Insurance and Casualty Insurance Company on February 27, 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