

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

CREDITOR’S JESSE AND ROSE BOONE’S NOTICE OF WITHDRAWAL MOTION FOR RELIEF FROM AUTOMATIC STAY

Creditors Jesse and Rose Boone, by and through the undersigned counsel, and respectfully moves this Honorable Court for entry of an Order permitting Movant to withdraw their previously filed Motion for Relief from Automatic Stay, and in support there of states as follows:

1. On January 28, 2026, Movant filed its Motion for Relief from Automatic Stay seeking relief from the Automatic Stay in Movant’s action in Circuit Court of the Tenth Judicial Circuit in and for Polk County, Florida under Case No: 2026:CA-003484A. The motion was originally returnable February 19, 2026 and adjourned to February 26, 2026 and finally March 26, 2026.
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



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.

Dated: March 17, 2026

TOMES LAW FIRM, PC
BY /S/ Frances A. Tomes
Frances A. Tomes
Attorneys for Creditors
Jesse and Rose Boone

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ORDER

This matter having come before the Court upon the Notice of Withdraw filed by Creditors Jesse and Rose Boone, by and through the undersigned counsel, seeking to withdraw its Motion for Relief from Automatic Stay previously filed on January 28, 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ORDERED that the Motion for Relief from the Automatic Stay filed by Jesse and Rose Boone on January 28, 2026 is hereby WITHDRAWN; and it is further ORDERED that any hearing scheduled in connection with the Motion is cancelled.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