UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION
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IN RE:	Chapter 11 Cases
TRAJECTOR HOLDINGS, LLC,[1]	Case No. 3:26-bk-_____
BENEFITS GROUP HOLDINGS, LLC,	Case No. 3:26-bk-_____
TRAJECTOR MEDICAL, LLC,	Case No. 3:26-bk-_____
INFINITE IP LLC,	Case No. 3:26-bk-_____
PERFECT PATH, LLC,	Case No. 3:26-bk-_____
TRAJECTOR ADMIN SERVICES, LLC,	Case No. 3:26-bk-_____
BENEFITS INSURANCE, LLC,	Case No. 3:26-bk-_____
MYLER INSURANCE SERVICES HOLDINGS, LLC,	Case No. 3:26-bk-_____
ANCHORSIX SERVICES, LLC,	Case No. 3:26-bk-_____
ATVANTAGE, LLC,	Case No. 3:26-bk-_____
TRAJECTOR MEDIA SERVICES, LLC,	Case No. 3:26-bk-_____
GLOBALTEK BPO LLC,	Case No. 3:26-bk-_____
MYLER DISABILITY HOLDINGS, LLC,	Case No. 3:26-bk-_____
MYLER DISABILITY, LLC,	Case No. 3:26-bk-_____
ADDUCO MEDIA, LLC,	Case No. 3:26-bk-_____
TRAJECTOR DISABILITY, LLC,	Case No. 3:26-bk-_____
CONTACT CENTER 1, LLC,	Case No. 3:26-bk-_____
BENEFITS KARMA, LLC,	Case No. 3:26-bk-_____
EXECUTIVE STAFFING SOLUTIONS, PLLC,	Case No. 3:26-bk-_____
AMPRY HOLDINGS, LLC,	Case No. 3:26-bk-_____
CONCIERGE STAFFING SERVICE MANAGEMENT, LLC,	Case No. 3:26-bk-_____
TRAJECTOR, INC.,	Case No. 3:26-bk-_____
Debtors.	(Joint Administration Pending)

_____/

[1] The Debtors' mailing address is 5950 NW 1st Place, Suite 200, Gainesville, FL 32607. The last four digits of each Debtor's federal tax identification number are: (i) Trajector Holdings, LLC (7528); (ii) Benefits Group Holdings, LLC (2029); (iii) Trajector Medical, LLC (5243); (iv) Infinite IP LLC (3723); (v) Perfect Path, LLC (3494); (vi) Trajector Admin Services, LLC (2231); (vii) Benefits Insurance, LLC (9835); (viii) Myler Insurance Services Holdings, LLC (3606); (ix) AnchorSix Services, LLC (5009); (x) Atvantage, LLC (7384); (xi) Trajector Media Services, LLC (7509); (xii) Globaltek BPO LLC (1684); (xiii) Myler Disability Holdings, LLC (9924); (xiv) Myler Disability, LLC (0845); (xv) Adduco Media, LLC (0257); (xvi) Trajector Disability, LLC (5136); (xvii) Contact Center 1, LLC (2329); (xviii) Benefits Karma, LLC (1850); (xix) Executive Staffing Solutions, PLLC (1841); (xx) Ampry Holdings, LLC (2323); (xxi) Concierge Staffing Service Management, LLC (2814); and (xxii) Trajector, Inc. (2128).

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DEBTORS' EMERGENCY MOTION FOR AN ORDER AUTHORIZING DEBTORS TO (I) PAY PREPETITION WAGES, SALARIES, EMPLOYEE BENEFITS, AND OTHER EMPLOYEE OBLIGATIONS, (II) MAINTAIN EMPLOYEE BENEFIT PROGRAMS AND (III) FOR RELATED RELIEF

(Emergency Hearing Requested)

Basis for Requested Emergency Relief

> The Debtors respectfully request the Court to conduct a hearing on this Motion as soon as possible (and prior to three business days of the Petition Date) consistent with Local Rule 2081-1(g)(3). Of critical importance to the Debtors is continued payment of employee wages and other employee benefits. Without the Debtors' employees, the Debtors will not be able to operate during the pendency of these cases. The Debtors reasonably believe that a hearing to consider the relief requested must be held on an emergency basis as soon as the Court's calendar will permit to avoid direct, immediate, and substantial harm to the Debtors' bankruptcy estates.

The above-captioned debtors and debtors in possession (collectively, the "Debtors"), by and through their proposed undersigned counsel, file this emergency motion ("Motion"), requesting the entry of an order authorizing the Debtors to pay prepetition wages, salaries, and employee benefits, and other employee obligations, maintain employee benefit programs and for related relief. In support of the Motion, the Debtors rely upon the *Declaration of Mark C. Healy in Support of Chapter 11 Petitions and First Day Relief* (the "First Day Declaration"), which was filed on or about the date hereof, and is incorporated herein by reference, and represent as follows:

Jurisdiction and Venue

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

2. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested herein are sections 105(a) and 363(b) of chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"), and Rule 2081-1(g)(3)

and 9013-1(d) of the Local Rules of the United States Bankruptcy Court for the Middle District of Florida ("Local Rules").

Background

4. On July 23, 2026 (the "Petition Date"), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code (collectively, the "Chapter 11 Cases").

5. The Debtors are operating their businesses and managing their affairs as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. For a detailed description of the Debtors and their operations, the Debtors respectfully refer the Court and parties in interest to the First Day Declaration.

Relief Requested

7. By way of this Motion, pursuant to sections 105(a), 363(b), and 507(a) of the Bankruptcy Code, the Debtors request (i) authority, but not direction, to (a) pay prepetition wages, salaries, reimbursable expenses, and other obligations on account of the Compensation and Benefits Programs (as defined below) in the ordinary course of business as provided herein, and (b) continue the Compensation and Benefits Programs, and (ii) related relief. The Debtors request, pursuant to this Motion, authority to pay prepetition obligations related to the Compensation and Benefits Programs, in an amount not to exceed **$1,623,862** as they become due in the ordinary course of business.

8. Pursuant to Local Rule 2081-1(g)(3), a schedule attached hereto as **Exhibit A** sets forth: (a) the amount of wages due to each of the Employees (as defined below) as of the Petition Date,[2] (b) the amounts to be withheld from such wages, including all applicable payroll taxes and

[2] The Debtors redacted the applicable employee name on **Exhibit A** in order to prevent discord among the employees that could result from disclosure of their respective compensation.

related benefits, (c) the period of time for which prepetition wages for such Employees are due, and (d) which Employees are presently employed by the Debtors. The following Employees are considered "insiders" (as such term is defined in 11 U.S.C. § 101(31)):

a. Kevin Frain, Chief Financial Officer, Trajector Holdings, LLC;

b. Daniel Bott, President, Trajector Disability, LLC; and

c. Tyler Leonard, President, Atvantage, LLC.

9. All applicable payroll taxes and related benefits, to the extent applicable, due to the Debtors' Employees will be paid concurrently with the payment of the prepetition wages to the Employees identified on **Exhibit A** when authority to pay such wages has been granted. For the reasons explained below, irreparable harm will result if the relief requested herein is not granted. *See* Local Rule 2081-1(g)(3)(F).

10. An estimate of prepetition obligations related to the Compensation and Benefits Programs is set forth below (collectively, the "Employee Obligations"). The monetary relief sought in the Proposed Order attached hereto as **Exhibit B** is discussed in further detail below and summarized in the following chart:

Employee Obligations	Pre-Petition Amount
Unpaid Compensation	$418,962.11
Supplemental Workforce Compensation	$61,779
Payroll Processing Fees	$54,000
Withholding Obligations	$120,246
Reimbursable Expenses	$0
Health Insurance Programs	$594,169.23
Life Insurance, Disability, and Other Insurance Programs	$10,205.16
401(k) Obligations[3]	$364,500

[3] For the avoidance of doubt, the 401(k) Obligations include Employee 401(k) Contributions, the Debtors' 401(k) Match, and any administrative and service fees paid in connection with the 401(k) Plans (each as defined and described below).

Employee Obligations	Pre-Petition Amount
Paid Leave	$0
Non-Insider Severance Practice	$0
Other Employee Programs	$0
Total Obligations	**$1,623,862**

Overview of Employees and Employee Obligations

I. The Debtors' Workforce

11. As of the Petition Date, the Debtors employ approximately 459 employees (the "Employees"). The Debtors also utilize the services of independent contractors ("Independent Contractors") for medical, administrative, and legal tasks (such Independent Contractors, the "Supplemental Workforce" and, together with the Employees, the Debtors' "Workforce"). The Supplemental Workforce is an important component of the Debtors' enterprise and consists of 17 individuals as of the Petition Date.

12. The Debtors' Workforce is comprised of highly specialized personnel whose services are indispensable to the Debtors' ongoing business operations and whose departure would cause irreparable damage upon the estates. The Debtors' businesses are labor intensive and sensitive to fluctuations in the labor market. During times of turbulent shifts in the labor market, failure to maintain the continued, uninterrupted services of their Workforce would materially and adversely impair the Debtors' efforts to operate during the Chapter 11 Cases and jeopardize the value of their businesses as a going concern. The labor market conditions presently facing the Debtors demonstrate that failure to pay prepetition wages will likely result in Employee attrition that cannot be remedied through post-petition recruitment.

13. The Workforce is generally composed of the following categories: (1) licensed medical professionals; (2) medical records analysts and documentation specialists trained in

diagnostic coding and symptom-to-condition mapping; (3) medical research analysts who review published medical research to identify causal and aggravating factors of disabilities; (4) attorneys with vast experience in pursuing Social Security Disability Insurance and Supplemental Security Income claims appeals; (5) administrative and case management personnel who coordinate client intake, compile evidence packets, and liaise with attorneys; and (6) IT staff and support services. The Debtors' Workforce includes personnel who are intimately familiar with the Debtors' business, processes, and systems, and possess unique skills and experience with the core business segments of the Debtors. Many of the Employees have developed relationships with clients and vendors that are essential to the Debtors' business. Each category draws from a specialized talent pool with limited supply and significant cross-industry labor competition.

14. Absent the requested relief, the Debtors will be unable to maintain the Workforce necessary to preserve going-concern value for the benefit of all creditors and parties in interest.

II. Compensation and Benefits Programs

15. The Debtors maintain various compensation and benefits programs (each as defined herein and collectively, the "Compensation and Benefits Programs"), and pay various administrative fees and premiums in connection therewith, including:

(a) Unpaid Compensation;

(b) Supplemental Workforce Compensation;

(c) Payroll Processing Fees;

(d) Withholding Obligations;

(e) Reimbursable Expenses;

(f) Health Insurance Programs;

(g) Life Insurance, Disability, and Other Programs;

(h) 401(k) Obligations;

(i) Paid Leave;

(j) Non-Insider Severance Practices;

(k) Employee Incentive Programs; and

(l) Other Employee Programs.

16. The Debtors believe that the vast majority of their Employees rely primarily on the Compensation and Benefits Programs to pay their daily living expenses, support their families and maintain the health of themselves and their family members. Employees will face significant adverse financial consequences if the Debtors are not permitted to continue administering the Compensation and Benefits Programs in the ordinary course of business. Furthermore, the Debtors' failure to honor their obligations in connection with the Compensation and Benefits Programs could result in attrition at a time when continuing business operations is paramount. Therefore, it is essential that the Debtors maintain and promote loyalty and morale among their Employees at this critical time.

17. Subject to the Court's approval and on the terms and conditions set forth herein, the Debtors intend to continue administering their Compensation and Benefits Programs in the ordinary course. The Debtors further request confirmation of their right to modify, change, and discontinue any of their Compensation and Benefits Programs and to implement new programs, policies, and benefits for Employees in the ordinary course of business during these Chapter 11 Cases, in their discretion and without the need for further Court approval, subject to applicable orders entered in these chapter 11 cases, including any order approving the Debtors' use of cash collateral, any agreements executed in contemplation of these Chapter 11 Cases, and the requirements of the Bankruptcy Code and the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

18. The Debtors estimate that, as of the Petition Date, they owe approximately **$1,623,862** in the aggregate on account of the Compensation and Benefits Programs.

A. Compensation, Payroll Processing Fees, Withholding Obligations, and Reimbursable Expenses

(i) Unpaid Compensation

19. The Debtors generally pay Employees' wages and salaries (the "Employee Compensation") every two weeks (each two-week period, the "Pay Period"). All Employees receive their wages every other Friday (*i.e.*, 26 Pay Periods per year) and are paid one week in arrears (each Pay Period ends on the Friday prior to the applicable pay date), and therefore the Debtors owe most Employees prepetition accrued and unpaid wages and salaries (the "Unpaid Compensation") as of the Petition Date. Unpaid Compensation also may be due for a variety of other reasons, including Employees holding issued but uncashed paychecks as of the Petition Date. On average, the Debtors spend approximately $5,458,000 per month on account of Unpaid Compensation.

20. As of the Petition Date, the Debtors owe approximately **$418,962.11** on account of Unpaid Compensation, all of which the Debtors estimate will come due within 15 days of the Petition Date.[4] None of the Employees is owed Unpaid Compensation as of the Petition Date in an amount exceeding the $17,150 priority cap imposed by section 507(a)(4) of the Bankruptcy Code. The Debtors request authority to pay the outstanding Unpaid Compensation due to Employees and to continue to pay such obligations in the ordinary course of business.

(ii) Supplemental Workforce Compensation

21. The Debtors pay the Supplemental Workforce at various times, whether on a

[4] For the avoidance of doubt, this estimate of Unpaid Compensation includes the Employee Payroll Taxes and Deductions described below.

weekly, monthly, as work is completed, or contractual basis (the "Supplemental Workforce Compensation" and, together with Employee Compensation, the "Compensation"), not through the Debtors' payroll processing, but as the Supplemental Workforce submits invoices. It is critical that the Debtors are able to continue honoring their obligations with respect to the Supplemental Workforce Compensation. Failure to timely pay the Supplemental Workforce Compensation could interrupt the Debtors' operations and have widespread negative effects throughout the Debtors' businesses. Staying current with respect to the Supplemental Workforce Compensation will help minimize unnecessary disruption to the Debtors' businesses.

22. On average, the Debtors pay approximately $84,245 in aggregate Supplemental Workforce Compensation per month. As of the Petition Date, the Debtors estimate that they owe approximately **$61,779** in Supplemental Workforce Compensation.

(iii) Payroll Processing

23. The Debtors utilize Automatic Data Processing, Inc. ("ADP") to administer payroll and several other employee-related benefits programs. ADP provides, among other things, the Debtors' payroll processing system, ensures proper tax and benefits withholding and garnishment of wages, manage the filing and remittance of all payroll taxes, and provides electronic timesheet management for Employees paid on an hourly basis. ADP administrative processing fees are two months in arrears. The last ADP invoice received was in June 2026 covering April and May 2026 fees. On average, the Debtors paid ADP administration fees of approximately $346,999 (the "Payroll Processing Fees") in the last year. As of the Petition Date, the Debtors estimate that they owe ADP approximately **$54,000** in Payroll Processing Fees.

(iv) Withholding Obligations

24. The Debtors are required by law to withhold from Employees' paychecks amounts related to, among other things, federal, state, and local income taxes and social security and

Medicare taxes (collectively, the "Employee Payroll Taxes") for remittance to applicable federal, state, and local taxing authorities. The Debtors must then pay the Employee Payroll Taxes from their own funds and pay, based upon a percentage of gross payroll, additional amounts for state and federal unemployment insurance (together with the Employee Payroll Taxes, the "Payroll Taxes").[5] On average, the Debtors remitted approximately $1,473,660 in Payroll Taxes each month. The Debtors estimate that, as of the Petition Date, there are accrued Payroll Taxes in the amount of $111,746.

25. During applicable pay periods, the Debtors also deduct certain amounts from Employees' paychecks, including but not limited to, garnishments, levies, child support and related fees, pre-tax contributions related to certain of the Health and Welfare Programs (as defined below), and fees related to such deductions (collectively, the "Deductions"). The Debtors transfer the amounts comprising such Deductions to the appropriate designated third-party recipients. On average, the Debtors withhold approximately $12,000 in Deductions each month. The Debtors estimate that, as of the Petition Date, there are accrued Deductions in the amount of $8,500.

26. As of the Petition Date, the Debtors estimate that the aggregate amount of accrued but unremitted Payroll Taxes and Deductions (collectively, the "Withholding Obligations") is approximately **$120,246**.[6] By way of this Motion, the Debtors seek authority, but not direction, to continue to forward to the appropriate third-party recipients, consistent with historical practice, any unremitted Withholding Obligations and to continue to honor the Withholding Obligations in

[5] Contemporaneously herewith, the Debtors have sought authority, but not direction, to pay certain prepetition taxes, assessments, fees, and other charges in the ordinary course of business pursuant to the *Debtors' Emergency Motion for Order Authorizing Debtors to Pay Prepetition Sales, Income,, and Other Taxes and Similar Obligations* (the "Tax Motion"). By way of this Motion, the Debtors do not seek authority to pay prepetition claims that may be covered by the relief sought in the Tax Motion.

[6] This amount includes accrued Withholding Obligations for unprocessed tax payments.

the ordinary course of business on a postpetition basis.

(v) Reimbursable Expenses

27. In the ordinary course of business, the Debtors reimburse certain Employees for reasonable and customary expenses incurred in the scope of their employment (the "Reimbursable Expenses"). Reimbursable Expenses generally include travel-related expenses arising from transportation, lodging, and dining that are incurred in connection with business travel for certain Employees. The Employee's supervisor and general manager must authorize business travel in advance before travel arrangements are made and costs are incurred.

28. Most Reimbursable Expenses are incurred by Employees using their own funds, and thus the Debtors reimburse such amounts to Employees directly. The Employees submit their expenses through an internal expense system and Debtors thereafter review, audit, and approve all such Reimbursable Expenses before reimbursing an Employee for any Reimbursable Expenses.

29. On average, the Debtors reimburse approximately $15,000 in Reimbursable Expenses each month. As of the Petition Date, the Debtors do not believe they owe any amount for Reimbursable Expenses but it is possible that Reimbursable Expenses have been incurred but not reported to the Debtors. As such, by this Motion the Debtors request the authority, but not direction, to continue reimbursing Employees for any Reimbursable Expenses in the ordinary course of business, regardless of whether they arose before or after the Petition Date.

B. Employee Benefits Programs

30. In the ordinary course of business, the Debtors offer eligible Employees various benefits programs, including the Health and Welfare Programs, the 401(k) Plan, the Employee Incentive Programs, Paid Leave, Other Employee Programs, and under certain circumstances and at the Debtors' discretion, the Non-Insider Severance Practice (each defined below) (collectively, the "Employee Benefit Programs").

(i) Health and Welfare Programs

31. As described in more detail below, the Debtors offer several health and welfare benefits programs to eligible Employees, including Health Insurance Programs, HSAs, FSAs, and Life Insurance, Disability, and Other Insurance Programs (each as defined and described below and, collectively, the "Health and Welfare Programs"). In addition, the Debtors pay certain routine administrative fees to third-party service providers in connection with administering the Health and Welfare Programs.

a. **Health Insurance Programs**

32. The Debtors offer the following health insurance programs (each, a "Health Insurance Program") to eligible Employees and their families:

Type of Benefits	Benefits Provider
Medical Plans	UMR by UnitedHealthcare
Dental and Vision Plans	Mutual of Omaha
Health Savings Account	WEX Inc.
Health Care Flexible Spending Accounts	WEX Inc.

i. Medical Plans

33. The Debtors offer certain full-time Employees medical and prescription drug benefit programs (the "Medical Plans"). The Medical Plans for eligible Employees, which include UMR HDHP and PPO plans, are administered by UMR by UnitedHealthcare ("UMR"). The Medical Plans are self-insured by the Debtors. The coverage in the Medical Plans differs depending on the level of coverage an Employee elects to receive, and monthly health care premiums differ depending on the Medical Plan in which an Employee is enrolled and whether the Employee has dependents covered by the applicable plan.

34. The Debtors spend approximately $267,271 per month on medical claims and

$98,865 per month on prescription drug claims, for a gross total of approximately $366,136 per month, asserted under the self-insured Medical Plans (collectively, the "Medical Claims"). The Debtors make payments on account of the Medical Claims as they are invoiced to the Debtors.

35. The Debtors are unable to determine with certainty the prepetition amounts due and outstanding on account of the Medical Plans because such claims are submitted and processed at varied times. However, based on historical trends, the Debtors estimate that, as of the Petition Date, they could owe approximately **$530,910** on account of prepetition Medical Plans, all of which the Debtors estimate will come due within 90 days of the Petition Date.

36. The Debtors pay certain administrative fees in connection with the Medical Plans ("Medical Plan Fees"). The total cost of such Medical Plan Fees is approximately $63,218 per month. The Debtors estimate that, as of the Petition Date, they owe approximately **$44,864.39** in Medical Plan Fees.

ii. Health Savings and Flexible Spending Accounts

37. The Debtors provide Employees with the option to contribute up to $4,400 per year for individual coverage and $8,750 for family coverage to a health savings account (collectively, the "HSAs").[7] Employees must participate in one of the Medical Plans to be eligible to participate in the HSAs. The HSAs allow for pre-tax payroll deductions to pay for qualified healthcare expenses. 462 current and former employees are enrolled in the HSAs. The Debtors provide an employer contribution of up to $300 per year per contributing Employee. On average, the Debtors pay approximately $4,400 per month in total HSA contributions. As of the Petition Date, the Debtors estimate that they owe approximately **$3,122.58** on account of HSA employer

[7] These amounts are the 2026 annual contribution limits set by federal law and do not include any applicable catch-up contributions for eligible Employees.

contributions.

38. The Debtors also provide eligible Employees with the option to contribute to dependent care or health care flexible savings accounts (collectively, the "FSAs") in an amount not to exceed the maximum amount allowed by federal law. The FSAs allow for pre-tax payroll deductions to pay for qualified expenses. 78 current and former employees contribute to the FSAs, with a monthly average employee contribution of approximately $12,781.

39. The Debtors pay certain fees to Wex Inc. ("WEX") for the administration of the HSAs and FSAs. On average, the Debtors pay Wex approximately $250 per month in total administrative fees for the administration of both HSAs and FSAs. As of the Petition Date, the Debtors estimate that they owe approximately **$177.42** for HSA and FSA administrative fees.

iii. Dental and Vision Plans

40. The Debtors' Employees are eligible to participate in vision insurance plans (the "Vision Plans") and dental insurance plans (the "Dental Plans"), both of which are administered by Mutual of Omaha. In sum, the Debtors spend approximately $21,270 per month on average in connection with the Vision Plans and Dental Plans. As of the Petition Date, the Debtors owe approximately **$15,094.84** in connection with the Vision Plans and Dental Plans.

41. In sum, as of the Petition Date, the Debtors estimate, based on historical trends, that approximately **$594,169.23** has accrued and are outstanding under Health Insurance Programs, all of which the Debtors estimate will come due within 90 days of the Petition Date.[8]

b. **Life Insurance, Disability, and Other Insurance Programs**

42. The Debtors offer Employee life insurance, executive life insurance, dependent life insurance, short-term disability insurance, long-term disability insurance, voluntary accident

[8] The Medical Plan costs are typically two months in arrears due to incurred-but-not-reported Medical Claims.

insurance, voluntary critical illness insurance, and voluntary hospital indemnity insurance (collectively, the "Life Insurance, Disability, and Other Insurance Programs") to eligible Employees through Guardian (the "Insurance and Disability Administrator"). The chart below outlines the various Life Insurance, Disability and Other Insurance Programs:

Type of Benefit	U.S. Benefits Provider	Funded by Debtors/Employees
Basic Life Insurance	Guardian	Debtors
Dependent Life Insurance	Guardian	Employee
Executive Life Insurance	Guardian	Debtors
Long-Term Disability	Guardian	Debtors
Voluntary Accident Insurance	Guardian	Employee
Voluntary Critical Illness Insurance	Guardian	Employee
Voluntary Hospital Indemnity Insurance	Guardian	Employee

iv. Life and Disability Insurance

43. The Debtors provide life insurance, executive life insurance, dependent life insurance, short-term disability insurance, and long-term disability insurance (collectively, the "Life and Disability Insurance Plans") to Employees and qualifying dependents. The Life and Disability Insurance Plans are administered by the Insurance and Disability Administrator and provide the financial protection and necessary safeguards for both the Workforce and their beneficiaries.[9]

44. The Debtors' total monthly cost of the Life and Disability Insurance Plans is approximately $14,380. As of the Petition Date, the Debtors estimate that they owe approximately

[9] This Motion does not seek authorization to pay affiliate officers. The Debtors shall separately seek authority to pay and provide benefits for affiliate officers.

$10,205.16 on account of premiums, fees and benefits in connection with the Life and Disability Insurance Plans.

v. Other Insurance Benefits

45. The Debtors' Employees also may purchase (i) supplemental life insurance to cover themselves, their spouses, and their children; (ii) voluntary accident insurance; (iii) voluntary critical illness insurance; and (iv) voluntary hospital indemnity insurance, each of which is fully self-funded by the Employee through the Life Insurance and Disability Administrator.

c. 401(k) Plan

46. The Debtors offer eligible Employees the opportunity to participate in a 401(k) plan (the "401(k) Plan"). Employees who participate in the 401(k) Plan can make pre-tax payroll contributions to their 401(k) accounts up to the maximum amount permitted by the Internal Revenue Code. Each participating Employee's 401(k) contributions are deducted automatically from each paycheck (the "401(k) Contributions"). The Debtors may match an eligible Employee's 401(k) Contributions up to six percent (6%) of such Employee's deferrals. The Debtors match an Employee's 401(k) each pay period (the "401(k) Match," and together with the 401(k) Contributions and any administrative and service fees, the "401(k) Obligations"). In the last twelve months, the Debtors spent $2,701,529 on account of 401(k) Matches. As of the Petition Date, the Debtors estimate that they have accrued approximately $191,000 of 401(k) Contributions by Employees. As of the Petition Date, the Debtors estimate that they owe approximately $160,000 on account of 401(k) Matches.

47. The 401(k) Plan is administered by Starbridge Benefits Solutions. As of the Petition Date, the Debtors estimate that they owe approximately $13,500 on account of administrative fees in connection with the 401(k) Plan.

48. As of the Petition Date, the 401(k) Obligations are approximately **$364,500**.

d. Paid Leave

49. The Debtors provide Employees with various forms of paid leave ("Paid Leave"). Employees generally accrue vested paid time off ("PTO") based on their hours worked for Employees paid by the hour or length of service for full-time Employees. Employees have three months to use their PTO, otherwise it is forfeited. As of the Petition Date, the Debtors estimate that their Employees have earned or accrued approximately $880,000 in the aggregate of unused PTO. By way of this Motion, the Debtors seek authority, but not direction, to administer the Paid Leave policy in the ordinary course of business.

50. In addition to PTO, Employees are provided unpaid leave under the Family and Medical Leave Act.

51. The Debtors believe that continuing the Paid Leave policies in accordance with prior practice is essential to maintaining positive Employee morale during these Chapter 11 Cases. Furthermore, the policies are generally broad-based programs upon which all eligible Employees have come to depend. The Debtors anticipate that their Employees will continue to utilize their accrued PTO in the ordinary course of business, which will not create any material cash payment requirements beyond the Debtors' regular payroll obligations.

e. Non-Insider Severance Practice

52. The Debtors, in the ordinary course of business, provide severance for certain Employees on a discretionary basis pursuant to certain informal guidelines (the "Non-Insider Severance Practice").[10] The Debtors' ability and flexibility to provide severance amounts, at its discretion, is critical to maintaining positive Employee morale and loyalty. Failure to continue the

[10] A "non-insider" is a party that does not qualify as an "insider" as defined in section 101(31) of the Bankruptcy Code. The Non-Insider Severance Practice typically provides the applicable Employee 4-weeks of salary, the return of the Debtors' equipment, and a signed severance agreement. All other forms of compensation and benefits are discontinued as of the effective date of the severance agreement.

Non-Insider Severance Practice could cause premature Employee turnover, which could undermine the Debtors' ongoing efforts to operate inside the Chapter 11 Cases.

53. In the last twelve (12) months, the Debtors have spent approximately $1,159,938 on account of the Non-Insider Severance Practice. By this Motion, the Debtors request authority, but not direction, to continue the Non-Insider Severance Practice and honor post-petition severance obligations in the ordinary course, but only with respect to non-insider Employees whose employment with the Debtors will terminate post-petition. For clarity, the Debtors are not seeking authority to pay severance for employees that were terminated before the Petition Date.

f. Employee Incentive Programs

54. The Debtors have maintained, in the ordinary course of business for the past three to four years, certain incentive programs to motivate and reward certain Employees, preserve Employee morale, and incentivize the Employees to hit specific performance metrics (collectively, the "Employee Incentive Programs"). The Employee Incentive Programs include performance-based incentive programs, such as (i) quarterly bonuses for certain Employees (the "Quarterly Management Bonus Program"), (ii) monthly performance bonuses (the "Departmental Incentive Plan"), and (iii) quarterly performance bonuses for certain Employees of Trajector Disability ("Trajector Disability Incentive Plan"). Awards under the Employee Incentive Programs are calculated based on specific performance metrics and timelines established pursuant to the applicable program and distributed at the Debtors' discretion. The Debtors are not seeking to pay prepetition amounts owed under the Employee Incentive Programs. However, by this Motion the Debtors request the authority, but not direction, to continue to honor any obligations under the Employee Incentive Programs in the ordinary course of business.

vi. Quarterly Management Bonus Program

55. The Debtors' various levels of management teams, managers, and subject matter experts are eligible to participate in the Quarterly Management Bonus Program. To be eligible to receive payment under the Quarterly Management Bonus Program, an eligible Employee must be employed by the Debtors for the entire quarter and an active Employee as of the payment date. Awards under the Quarterly Management Bonus Program are paid after the period for which the award is calculated.

56. Awards under the Quarterly Management Bonus Program are generally based on the actual performance of the individual – as calculated by the Debtors' EBITDA performance for the quarter – but remains subject to discretion.[11] 193 Employees are eligible to receive payment under the Quarterly Management Bonus Program.[12] The Debtors estimate that the average quarterly payment for all eligible Employees is approximately $250,000 to $300,000 under the Quarterly Management Bonus Program.

vii. Departmental Incentive Plan

57. The Employees eligible to participate in the Departmental Incentive Plan are primarily hourly and supervisor-level Employees that are employed for the qualifying month. Awards under the Departmental Incentive Plan are typically paid at the end of each qualifying month or the subsequent month for which the award is calculated.

58. Awards under the Departmental Incentive Plan are based on Key Performance Indicators or certain department-specific metrics. 247 Employees are eligible to receive payment

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[13] The Debtors use a point system. Employees have assigned bonus points depending on their position. 5% of quarterly EBITDA is used, and each employee's bonus is based on their relative points.

[12] This program applies to only one insider: the President of Trajector Disability, LLC. The remainder of Quarterly Management Bonus Program recipients are Employees that directly or indirectly report to an executive and do not make, or participate in making, any corporate-level decisions and policies.

under the Departmental Incentive Plan. The average monthly payment for all eligible Employees under the Departmental Incentive Plan is approximately $100,000.

viii. Trajector Disability Incentive Plan

59. The Employees eligible to participate in the Trajector Disability Incentive Plan are attorneys that are employed for the qualifying quarter. Awards under the Trajector Disability Incentive Plan are typically paid at the end of each qualifying quarter.

60. Awards under the Trajector Disability Incentive Plan are based on department-specific metrics centered on successful case outcomes. 22 Employees are eligible to receive payment under the Trajector Disability Incentive Plan. The average quarterly payment for all eligible Employees under the Trajector Disability Incentive Plan is approximately $150,000 to $175,000.

61. The Debtors believe the Employee Incentive Programs are integral to the Debtors' business operations because they align the interests of eligible Employees with those of the Debtors by linking payments under the Employee Incentive Programs to the overall performance and efficiency of the Debtors' operations. Further, the Debtors believe that many Employees who are eligible for awards under the Employee Incentive Programs view such awards as an integral part of their overall compensation and rely on such awards to pay their living expenses and support their families.

g. Other Employee Programs

62. The Debtors encourage certain Employees to take advantage of growth and development opportunities and recognize that gaining knowledge and skills through education is one of the most important benefits to the Debtors' growth and ability to assist their clients. Employees working a minimum of 30 hours or more per workweek are eligible for reimbursement of tuition and continuing education expenses to qualify for tuition assistance (the "Tuition Assistance Program")

or Professional Credential Reimbursement (as defined below). The Debtors also provide a special rate for Employees utilizing the services of Trajector Medical, LLC (the "Trajector Medical Services").

viii. Tuition Assistance Program

63. The Debtors' Tuition Assistance Program strengthens the Debtors' dedication to professional development and career advancement and support of Employees' career goals. The program is available to eligible Employees taking course work that leads to a new degree or professional certification. The Employee reimbursement is limited to $5,250 per calendar year. Prior approval is required and eligibility requirements include the Employee being employed at least six months, meeting performance expectations, and not on a performance improvement plan. Participants must be on the company payroll at the start and end of the course/class and must not voluntarily leave employment with the Debtors within 12 months of receiving the reimbursement, otherwise the amount reimbursed will need to be repaid in full. Coursework must be related to the Debtors' operations or provide additional knowledge or skills for the Debtors' benefit.

64. In the last twelve (12) months, the Debtors have spent approximately $25,000 on account of the Tuition Assistance Program. As of the Petition Date, the Debtors do not believe they owe any amount on account of the Tuition Assistance Program. However, by this Motion the Debtors request the authority, but not direction, to continue to honor any obligations under the Tuition Assistance Program in the ordinary course of business.

ix. Professional Credential Reimbursement

65. The Debtors reimburse eligible Employees for certain fees for classes needed to receive continuing education credits to maintain certifications and licenses related to the Employee's job or scope of work (the "Professional Credential Reimbursements"). The annual reimbursement

limit is $2,500. The Professional Credential Reimbursements are processed and approved using the Company's expense report form.

66. In the last twelve (12) months, the Debtors have spent approximately $10,000 on account of the Professional Credential Reimbursements. As of the Petition Date, the Debtors do not believe they owe any amount on account of the Professional Credential Reimbursements. However, by this Motion the Debtors request the authority, but not direction, to continue to honor any obligations under the Professional Credential Reimbursements in the ordinary course of business.

x. Special Rate on Trajector Medical Services

67. The Debtors provide Trajector Medical Services at no cost to eligible Employees and their qualified spouses or domestic partners. No specific dollar obligation is associated with this service to Employees, instead, the Debtors provide their ordinary-course services under Trajector Medical Services without charge to eligible Employees. By this Motion, the Debtors request the authority, but not direction, to continue providing the Trajector Medical Services to their Employees in the ordinary course of business.

The Relief Requested Should Be Granted

I. Payment of Employee Obligations Is Warranted under Sections 363(b)(1) and 105(a) of the Bankruptcy Code, and the Doctrine of Necessity

68. A bankruptcy court may authorize a debtor to pay certain prepetition obligations pursuant to section 363(b) of the Bankruptcy Code. 11 U.S.C. § 363(b)(1). Section 363(b) provides, in pertinent part, that "[t]he trustee, after notice and a hearing, may use, sell, or lease, other than in the ordinary course of business, property of the estate." To approve the use of assets outside the ordinary course of business pursuant to section 363(b) of the Bankruptcy Code, courts require only that the debtor "show that a sound business purpose justifies such actions." *In re*

Montgomery Ward Holding Corp., 242 B.R. 147, 153 (D. Del. 1999) (internal citations omitted); *see also In re Phoenix Steel Corp.*, 82 B.R. 334, 335–36 (Bankr. D. Del. 1987).

69. In addition, the Court has the authority, pursuant to its equitable powers under section 105(a) of the Bankruptcy Code, to authorize the relief requested herein because such relief is necessary for the Debtors to carry out their fiduciary duties under section 1107(a) of the Bankruptcy Code. Section 105(a) of the Bankruptcy Code empowers bankruptcy courts to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a). Section 1107(a) of the Bankruptcy Code "contains an implied duty of the debtor-in-possession" to "protect and preserve the estate, including an operating business' going-concern value," on behalf of a debtor's creditors and other parties in interest. *In re CEI Roofing, Inc.*, 315 B.R. 50, 59 (Bankr. N.D. Tex. 2004) (citations omitted); *see also Unofficial Comm. of Equity Holders v. McManigle* (*In re Penick Pharm., Inc.*), 227 B.R. 229, 232–33 (Bankr. S.D.N.Y. 1998) ("[U]pon filing its petition, the Debtor became debtor in possession and, through its management . . . was burdened with the duties and responsibilities of a bankruptcy trustee.").

70. Furthermore, in a long line of well-established decisions, courts consistently have permitted payment of prepetition obligations that are necessary to preserve or enhance the value of a debtor's estate. *In re Lehigh & New Eng. Ry. Co.*, 657 F.2d 570, 581 (3d Cir. 1981) (holding that "if payment of a claim which arose prior to reorganization is essential to the continued operation of the . . . [business] during reorganization, payment may be authorized even if it is made out of [the] corpus"); *Dudley v. Mealey*, 147 F.2d 268, 271 (2d Cir. 1945) (extending doctrine for payment of prepetition claims beyond railroad reorganization cases), *cert. denied* 325 U.S. 873 (1945); *Mich. Bureau of Workers' Disability Comp. v. Chateaugay Corp.* (*In re Chateaugay*

Corp.), 80 B.R. 279, 285–86 (S.D.N.Y. 1987) (approving lower court order authorizing payment of prepetition wages, salaries, expenses, and benefits).

71. In addition, the Court may rely on its equitable powers under section 105(a) of the Bankruptcy Code and the doctrine of necessity to authorize the payment of prepetition claims when such payment is essential to the continued operation of a debtor's business. *See, e.g., In re Just for Feet*, 242 B.R. 821, 824–25 (D. Del. 1999) (holding that section 105(a) of Bankruptcy Code provides statutory basis for payment of prepetition claims under the doctrine of necessity particularly when such payment is necessary for the debtor's survival during chapter 11); *In re Columbia Gas Sys., Inc.*, 171 B.R. 189, 191–92 (Bankr. D. Del. 1994) (confirming that the doctrine of necessity is standard for enabling a court to authorize payment of prepetition claims before confirming a plan).

72. Indeed, relief similar to that sought herein has been granted by courts in this and other Districts in Florida. *See, e.g., In re Red Lobster Management, LLC*, Case No. 6:24-bk-02486-GER (Bankr. M.D. Fla. Jun. 14, 2024); *In re Robb & Stucky LLLP*, Case No. 8:11-bk-02801-CAD (Bankr. M.D. Fla. Mar. 11, 2011); *In re Cargo Transp. Svcs., Inc.*, Case No. 11-bk-00432-MGW (Bankr. M.D. Fla. Jan. 20, 2011); *In re E-Brands Rests., LLC, et al*., Case No. 10-bk-18282-KRM (Bankr. M.D. Fla. Aug. 20, 2010); *In re CCI Liquidation, Inc., fka Custom Cable Indus., Inc.,* Case No. 10-bk-18478-MGW (Bankr. M.D. Fla. Aug. 9, 2010); *In re Taylor, Bean & Whitaker Mortgage Corp*., Case No. 09-bk-07047-JAF (Bankr. M.D. Fla. Sep. 24, 2009); *In re Land Resource, LLC*, Case No. 08-bk-10159-ABB (Bankr. M.D. Fla. Oct. 31, 2008); *In re Vital Pharmaceuticals, Inc., et al.,* No. 22-17842-PDR (Bankr. S.D. Fla. Oct. 14, 2022); *In re American Purchasing Services, LLC d/b/a American Medical Depot, et al.,* No. 20-23495-SMG (Bankr. S.D. Fla. Dec. 16, 2020); *In re Tamarac 10200, LLC, et al.,* No. 20-23356-PDR (Bankr. S.D. Fla. Dec.

10, 2020); *In re It'Sugar FL I LLC, et al.,* No. 20-20259-RAM (Bankr. S.D. Fla. Sept. 29, 2020); *In re Magnum Construction Management, LLC f/k/a Munilla Construction Management, LLC,* No 19-12821-AJC (Bankr. S.D. Fla. Mar. 7, 2019); *In re National Auto Lenders, Inc.*, No. 18-24586-LMI (Bankr. S.D. Fla. Nov. 29, 2018); *In re Goodman and Dominguez, Inc., et al.*, No. 17-17237-RAM (Bankr. S.D. Fla. July 7, 2017); *In re Goodman and Dominguez, Inc., et al.*, No. 16-10056-RAM (Bankr. S.D. Fla. Jan. 1, 2016); *In re Adinath Corp., et al.,* No. 15-16885-LMI (Bankr. S.D. Fla. April 17, 2015); *In re Maguire Group Holdings, Inc., et al.,* No. 11-39347-RAM (Bankr. S.D. Fla. Oct. 26, 2012); *In re Gulfstream Intern. Group, Inc., et al.*, No. 10-44131-JKO (Bankr. S.D. Fla. Nov. 8, 2010); *In re Medical Staffing Network Holdings, Inc., et al.*, No. 10-29101-EPK (Bankr. S.D. Fla. July 7, 2010); *In re DM Indus., Ltd.*, No. 09-15533-LMI (Bankr. S.D. Fla. Mar. 31, 2009); *In re Campbellton-Graceville Hospital Corporation,* Case No. 17-40185-KKS (Bankr. N.D. Fla. May 11, 2017); and *In re Wood Resource Recovery, L.L.C.,* Case No. 16-10014-KKS (Bankr. N.D. Fla. Feb. 11, 2016).

73. In this case, the relief requested by this Motion represents a sound exercise of the Debtors' business judgment, is necessary to avoid immediate and irreparable harm to the Debtors' estates, and is justified under sections 105(a) and 363(b) of the Bankruptcy Code. Authorizing the Debtors to pay prepetition wages, employee benefits, and similar items will benefit the Debtors' estates and their creditors by allowing the Debtors' business operations to continue without interruption. Indeed, without the relief requested herein being granted, the Debtors are at the risk of significant Employee attrition, as the Debtors' Employees may seek alternative opportunities, perhaps with the Debtors' competitors. Employee attrition would cause the Debtors to incur additional expenses to find appropriate and experienced replacements, severely disrupting the Debtors' operations at a critical juncture. Additionally, the loss of valuable Employees, who are

the lifeblood of the Debtors' operations, would deplete the Debtors' Workforce, thereby hindering the Debtors' ability to meet their client obligations and likely diminishing the Debtors' ability to carry out their chapter 11 strategy.

74. In addition to Employee attrition, failure to satisfy certain prepetition obligations will likely jeopardize Employee morale and loyalty at a time when Employee support is critical to the Debtors' businesses. The majority of the Debtors' Employees rely exclusively on their compensation, benefits and reimbursement of expenses to satisfy their daily living expenses. These Employees will be exposed to significant financial difficulties and other distractions if the Debtors are not permitted to honor the Employee Obligations. Similarly, if the Court does not authorize the Debtors to honor their various obligations under the Health Insurance Programs, many Employees will lose access to health coverage at a time when the Debtors need their Employees to perform their jobs at peak efficiency. The loss in morale and potential distraction of Employees worrying about paying their bills and their healthcare costs will harm the Debtors' ability to operate and serve clients at their typical high standards, causing an erosion in the Debtors' value.

75. Similarly, the Supplemental Workforce is an important component of the Debtors' operations, ensuring that key operational initiatives critical to the Debtors' ability to operate during these Chapter 11 Cases continue without interruption. The Supplemental Workforce consists of individuals across a number of the Debtors' departments. Failure to timely pay the obligations related to their Supplemental Workforce would endanger the Debtors' reorganization efforts and would cause widespread negative effects throughout the Debtors' businesses.

76. The relief requested by this Motion represents a sound exercise of the Debtors' business judgment, is necessary to avoid immediate and irreparable harm to the Debtors' estates and is justified under sections 363(b) and 105(a) of the Bankruptcy Code. Authorizing the Debtors

to pay or honor the Employee Obligations will benefit the Debtors' estates and their stakeholders by allowing the Debtors' business operations to continue without interruption.

II. Payment of Employee Obligations Would Not Prejudice Parties in Interest

77. The Debtors believe that the vast majority of the prepetition Employee Obligations constitute priority claims under sections 507(a)(4) or (5) of the Bankruptcy Code. As priority claims, the Employee Obligations are entitled to payment in full before any general unsecured claims asserted against the Debtors can be paid. Thus, the relief requested largely affects only the timing of the payment of the priority prepetition Employee Obligations and should not prejudice the rights of general unsecured creditors or other parties in interest.

III. Payment of Certain Employee Obligations Is Required by Law

78. The Debtors also seek authority to remit certain Payroll Taxes and Deductions to the appropriate entities. These amounts principally represent Employee earnings that governments, Employees, and judicial authorities have designated for deduction from Employees' paychecks. Indeed, certain Deductions, including contributions to the Employee Benefit Programs and, as applicable, child support and alimony payments, are not property of the Debtors' estates because they have been withheld from Employees' paychecks on another party's behalf. *See* 11 U.S.C. § 541(b); *Begier v. IRS*, 496 U.S. 53, 66–67 (1990) (concluding that withholding taxes are property held by a debtor in trust for another and are, therefore, not property of debtor's estate). Further, federal and state laws require the Debtors and their officers to make certain tax payments that have been withheld from their Employees' paychecks. *See* 26 U.S.C. §§ 6672 and 7501(a); *see also City of Farrell v. Sharon Steel Corp.*, 41 F.3d 92, 95-97 (3d Cir. 1994) (finding that state law requiring a corporate debtor to withhold city income tax from its employees' wages created a trust relationship between debtor and the city for payment of withheld income taxes); *DuCharmes & Co., Inc. v. State of Mich.* (*In re DuCharmes & Co.*), 852 F.2d 194, 196 (6th Cir. 1988) (noting that

individual officers of a company may be held personally liable for failure to pay trust fund taxes). Because certain Payroll Taxes and Deductions are not property of the Debtors' estates, the Debtors request that the Court authorize them to transmit the Payroll Taxes and Deductions to the proper parties in the ordinary course of business.

IV. Most of the Severance Payments the Debtors Seek to Pay Fall Within 363(c)(1) and/or Section 503(c) of the Bankruptcy Code

79. In an effort to provide comfort to Employees given the uncertainty attendant to a company operating in chapter 11, the Debtors seek authority, but not direction, to continue the Non-Insider Severance Practice with respect to non-insider Employees who are terminated postpetition; provided, however, that except as otherwise required by non-bankruptcy law, the Debtors will pay such obligations only to the extent that they are entitled to priority treatment under section 507(a)(4) of the Bankruptcy Code (subject to the cap provided therein) or administrative expense treatment under section 503(b)(1) of the Bankruptcy Code. For the avoidance of doubt, the Debtors are not requesting authority to and will not make any payments that fall outside the limitations of section 503(c), to the extent applicable.

80. Moreover, the Non-Insider Severance Practice does not implicate section 503(c)(3) because it is within the ordinary course of the Debtors' business. *See* 11 U.S.C. § 503(c)(3) (prohibiting certain payments "outside of the ordinary course of business"). If section 503(c) is not implicated, the Court may grant the requested relief if it finds that a non-insider severance program satisfies the requirements of section 363(b) of the Bankruptcy Code. *See In re Mesa Air Group, Inc.*, Ch. 11 Case No. 10-10018 (MG), 2010 WL 3810899, at *3 (Bankr. S.D.N.Y. Sept. 24, 2010) (noting that compensation plans within the ordinary course of business are governed by section 363 of the Bankruptcy Code, not section 503(c)); *In re Nellson Nutraceutical, Inc.*, 369 B.R. 787, 791 (Bankr. D. Del. 2007) (determining that "the modification of [the debtors' employee

bonus compensation plan] is within the ordinary course of the Debtors' business under section 363(c)(1) of the Bankruptcy Code" and, therefore, section 503(c)(3) is "not applicable"). For the reasons stated, discretion to continue the Non-Insider Severance Practice as set forth in this Motion is critical and necessary to assuage Employee fears and motivate them to achieve the Debtors' chapter 11 objectives. Accordingly, the requested relief should be approved.

81. For the foregoing reasons, payment of the prepetition Employee Obligations is necessary, appropriate, and in the best interests of the Debtors, their estates, and all other parties in interest in these cases. Accordingly, the Court should authorize the relief requested herein.

Bankruptcy Rule 6003(b) Has Been Satisfied

82. Bankruptcy Rule 6003(b) provides that, to the extent relief is necessary to avoid immediate and irreparable harm, a bankruptcy court may issue an order granting "a motion to use, sell, lease, or otherwise incur an obligation regarding property of the estate, including a motion to pay all or part of a claim that arose before the filing of the petition" prior to twenty-one (21) days after the Petition Date. Fed. R. Bankr. P. 6003(b). As explained above and in the First Day Declaration, the Debtors would suffer immediate and irreparable harm if the relief sought herein is not promptly granted. Accordingly, the Debtors submit that the relief requested herein is necessary to avoid immediate and irreparable harm, and, therefore, Bankruptcy Rule 6003 is satisfied.

Request for Bankruptcy Rule 6004(a) and (h) Waivers

83. To implement the foregoing successfully, the Debtors seek waivers of the notice requirements under Bankruptcy Rule 6004(a) and the fourteen (14)-day stay of an order authorizing the use, sale, or lease of property under Bankruptcy Rule 6004(h). As explained above and in the First Day Declaration, the relief requested herein is necessary to avoid immediate and irreparable harm to the Debtors. Accordingly, ample cause exists to justify the waiver of the notice

requirements under Bankruptcy Rule 6004(a) and the fourteen (14)-day stay imposed by Bankruptcy Rule 6004(h), to the extent such notice requirements and such stay apply.

Reservation of Rights

84. Nothing contained herein is intended to be or shall be construed as (i) an admission as to the validity of any claim against the Debtors or any liens satisfied pursuant to this Motion; (ii) an agreement or obligation to pay any claims; (iii) a waiver of any claims or causes of action that may exist against any creditor or interest holder; (iv) a waiver of the Debtors' or any appropriate party in interest's rights to dispute any claim; or (v) an approval, assumption, or rejection of any agreement, contract, program, policy, or lease under section 365 of the Bankruptcy Code, including, without limitation, any or any pension plan. Likewise, if the Court grants the relief sought herein, any payment made pursuant to the Court's order is not intended to be and should not be construed as an admission to the validity of any claim or a waiver of the Debtors' rights to dispute such claim subsequently.

WHEREFORE, the Debtors respectfully request that the Court enter an Order in the form attached hereto as **Exhibit B**, granting the relief requested herein on an interim basis, and after a final hearing, on a final basis, and granting such other and further relief as is just and proper.

Dated: July 23, 2026

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Proposed Counsel for the Debtors and Debtors-in-Possession

Exhibit A

(Local Rule 2081-1(g)(3) Schedule)

NAME	GROSS PAY	FEDERAL INCOME - EMPLOYEE TAX	MEDICARE - EMPLOYEE TAX	SOCIAL SECURITY - EMPLOYEE TAX	WORKED IN STATE - EMPLOYEE	TOTAL VOLUNTARY DEDUCTIONS	NET PAY	PERIOD OF TIME	INSIDER
[redacted]	375.14	20.59	4.97	21.23	13.50	55.49	259.37	7/20/26 - 7/22/26	No
	364.83	0.30	5.15	22.04	5.17	25.14	307.02	7/20/26 - 7/22/26	No
	441.21	16.19	5.70	24.37	-	145.27	249.70	7/20/26 - 7/22/26	No
	898.90	79.92	12.77	54.58	36.77	72.86	642.00	7/20/26 - 7/22/26	No
	460.76	21.59	6.05	25.87	8.40	111.85	287.00	7/20/26 - 7/22/26	No
	926.12	25.27	12.19	52.12	-	104.36	732.19	7/20/26 - 7/22/26	No
	509.09	14.22	7.31	31.25	12.36	30.55	413.41	7/20/26 - 7/22/26	No
	766.87	57.23	10.29	43.99	25.48	92.50	537.40	7/20/26 - 7/22/26	No
	1,730.77	131.66	25.14	107.51	-	57.42	1,409.03	7/20/26 - 7/22/26	No
	483.84	-	7.01	30.00	-	-	446.83	7/20/26 - 7/22/26	No
	329.67	12.32	4.48	19.16	-	25.54	268.18	7/20/26 - 7/22/26	No
	482.40	9.66	7.00	29.91	10.26	14.41	404.90	7/20/26 - 7/22/26	No
	431.79	-	5.99	25.60	-	38.77	361.44	7/20/26 - 7/22/26	No
	381.73	7.89	5.46	23.35	13.56	24.42	307.04	7/20/26 - 7/22/26	No
	385.76	17.81	5.36	22.91	-	34.77	304.92	7/20/26 - 7/22/26	No
	468.03	23.86	6.14	26.27	-	72.51	339.25	7/20/26 - 7/22/26	No
	3,807.70	428.85	52.16	-	144.84	575.64	2,573.83	7/20/26 - 7/22/26	No
	490.99	29.41	7.02	30.02	19.14	40.47	364.94	7/20/26 - 7/22/26	No
	610.10	40.07	8.15	34.83	24.19	66.62	436.25	7/20/26 - 7/22/26	No
	387.84	-	5.60	23.93	6.90	14.56	336.85	7/20/26 - 7/22/26	No
	645.15	47.63	9.35	40.01	26.99	47.21	473.97	7/20/26 - 7/22/26	No
	368.75	-	5.15	22.04	9.30	39.11	293.15	7/20/26 - 7/22/26	No
	455.81	-	6.52	27.88	4.48	19.83	397.10	7/20/26 - 7/22/26	No
	488.40	-	6.98	29.85	11.78	21.54	418.25	7/20/26 - 7/22/26	No
	457.32	-	6.53	27.93	-	35.83	387.04	7/20/26 - 7/22/26	No
	405.10	36.20	5.17	22.10	7.01	116.10	211.41	7/20/26 - 7/22/26	No
	434.26	21.42	5.63	24.06	15.32	46.50	321.33	7/20/26 - 7/22/26	No
	552.87	40.58	7.94	33.96	-	43.81	426.57	7/20/26 - 7/22/26	No
	451.84	24.09	6.28	26.84	-	41.52	353.12	7/20/26 - 7/22/26	No
	458.11	-	6.64	28.40	-	-	423.06	7/20/26 - 7/22/26	No
	457.63	27.57	6.64	28.37	14.27	21.62	359.17	7/20/26 - 7/22/26	No
	491.31	-	6.75	28.86	-	67.39	388.31	7/20/26 - 7/22/26	No
	1,122.12	130.26	16.28	69.59	44.02	78.33	783.65	7/20/26 - 7/22/26	No
	24.15	-	0.35	1.50	-	0.72	21.58	7/20/26 - 7/22/26	No
	384.62	-	5.58	23.85	-	11.54	343.66	7/20/26 - 7/22/26	No
	393.97	16.66	5.39	23.07	13.04	66.66	269.15	7/20/26 - 7/22/26	No
	613.39	41.31	8.83	37.76	-	72.28	453.20	7/20/26 - 7/22/26	No
	429.71	10.49	4.40	18.82	-	142.65	253.36	7/20/26 - 7/22/26	No
	680.41	50.04	9.68	41.38	-	58.31	520.99	7/20/26 - 7/22/26	No
	193.20	6.00	1.11	4.73	-	122.72	58.65	7/20/26 - 7/22/26	No
	515.18	30.88	7.22	30.86	19.85	48.29	378.09	7/20/26 - 7/22/26	No
	455.17	-	6.33	27.07	3.90	38.77	379.10	7/20/26 - 7/22/26	No
	248.06	4.04	3.39	14.49	-	95.12	131.02	7/20/26 - 7/22/26	No
	369.89	16.79	5.23	22.36	13.10	20.41	292.01	7/20/26 - 7/22/26	No
	442.25	18.20	5.62	24.04	-	150.21	244.18	7/20/26 - 7/22/26	No
	561.83	39.57	8.15	34.83	17.02	22.47	439.79	7/20/26 - 7/22/26	No
	368.78	7.66	3.96	16.95	5.49	136.64	198.08	7/20/26 - 7/22/26	No
	751.16	58.42	10.64	45.51	26.12	63.03	547.44	7/20/26 - 7/22/26	No
	366.69	6.17	5.25	22.46	11.08	37.12	284.61	7/20/26 - 7/22/26	No
	382.70	-	5.54	23.68	11.75	12.21	329.53	7/20/26 - 7/22/26	No
	463.38	-	6.69	28.61	7.80	29.54	390.73	7/20/26 - 7/22/26	No
	1,467.11	106.51	21.29	91.03	-	166.26	1,082.03	7/20/26 - 7/22/26	No
	822.94	58.66	11.20	47.89	-	162.42	542.77	7/20/26 - 7/22/26	No
	437.59	21.72	6.05	25.85	9.90	46.98	327.10	7/20/26 - 7/22/26	No
	476.52	26.17	6.55	27.99	12.71	56.83	346.28	7/20/26 - 7/22/26	No
	643.69	49.70	9.05	38.67	27.76	67.58	450.92	7/20/26 - 7/22/26	No
	474.80	30.68	6.89	29.44	12.76	9.50	385.55	7/20/26 - 7/22/26	No
	308.44	-	4.38	18.74	-	7.25	278.07	7/20/26 - 7/22/26	No
	475.50	7.50	6.53	27.92	10.49	52.05	371.02	7/20/26 - 7/22/26	No
	664.50	22.66	9.64	41.21	20.40	111.93	458.67	7/20/26 - 7/22/26	No
	461.55	24.40	6.32	27.03	16.74	54.26	332.80	7/20/26 - 7/22/26	No
	669.86	-	9.71	41.53	87.33	-	531.29	7/20/26 - 7/22/26	No
	469.44	-	6.81	29.11	38.26	-	395.27	7/20/26 - 7/22/26	No
	597.01	-	8.66	37.02	69.12	-	482.22	7/20/26 - 7/22/26	No
	3,333.47	707.79	48.40	206.93	-	103.20	2,267.15	7/20/26 - 7/22/26	No
	1,017.70	98.46	13.79	58.98	-	131.26	715.20	7/20/26 - 7/22/26	No
	1,423.00	172.52	19.74	84.39	53.60	179.31	913.44	7/20/26 - 7/22/26	No
	2,076.34	149.49	26.60	113.72	71.45	544.69	1,170.39	7/20/26 - 7/22/26	No
	2,794.15	347.42	36.67	156.81	151.33	435.34	1,633.75	7/20/26 - 7/22/26	No
	658.35	46.63	9.25	39.54	-	62.01	500.93	7/20/26 - 7/22/26	No
	2,003.08	237.29	29.07	124.30	111.64	136.16	1,354.60	7/20/26 - 7/22/26	No
	2,094.31	69.66	26.84	114.77	78.65	341.15	1,463.25	7/20/26 - 7/22/26	No

NAME	GROSS PAY	FEDERAL INCOME - EMPLOYEE TAX	MEDICARE - EMPLOYEE TAX	SOCIAL SECURITY - EMPLOYEE TAX	WORKED IN STATE - EMPLOYEE	TOTAL VOLUNTARY DEDUCTIONS	NET PAY	PERIOD OF TIME	INSIDER
[redacted]	1,153.96	88.24	16.74	71.58	-	100.40	877.00	7/20/26 - 7/22/26	No
	816.70	60.29	11.03	47.18	-	104.97	593.23	7/20/26 - 7/22/26	No
	1,269.44	107.83	16.83	71.96	-	230.41	842.42	7/20/26 - 7/22/26	No
	2,019.23	155.92	28.51	121.88	55.18	190.40	1,467.35	7/20/26 - 7/22/26	No
	3,807.70	549.89	52.59	-	117.59	423.20	2,539.88	7/20/26 - 7/22/26	No
	1,384.95	111.58	19.73	84.36	-	133.74	1,035.54	7/20/26 - 7/22/26	No
	1,833.75	183.25	26.84	114.75	78.28	117.48	1,313.15	7/20/26 - 7/22/26	No
	982.36	156.73	14.25	60.93	68.24	105.51	576.70	7/20/26 - 7/22/26	No
	2,743.39	255.13	38.46	164.45	174.62	462.60	1,613.62	7/20/26 - 7/22/26	No
	865.39	-	12.55	53.67	-	26.87	772.29	7/20/26 - 7/22/26	No
	2,352.65	377.47	34.07	145.68	-	241.43	1,554.00	7/20/26 - 7/22/26	No
	1,279.73	334.22	17.99	76.93	-	119.29	731.31	7/20/26 - 7/22/26	No
	1,038.46	70.63	15.06	64.41	-	31.16	857.21	7/20/26 - 7/22/26	No
	946.17	89.21	13.42	57.37	43.13	77.95	665.10	7/20/26 - 7/22/26	No
	1,976.54	159.42	27.80	118.85	62.30	139.98	1,443.54	7/20/26 - 7/22/26	No
	3,052.60	454.70	43.18	-	255.71	636.11	1,596.66	7/20/26 - 7/22/26	No
	605.77	44.64	8.78	37.56	25.88	24.23	464.68	7/20/26 - 7/22/26	No
	1,688.08	270.05	23.41	100.10	47.65	389.64	857.24	7/20/26 - 7/22/26	No
	15.00	-	0.04	0.17	-	14.75	-	7/20/26 - 7/22/26	No
	1,197.12	74.55	15.78	67.48	40.20	173.03	820.81	7/20/26 - 7/22/26	No
	1,675.97	242.72	23.25	99.40	-	278.76	1,031.84	7/20/26 - 7/22/26	No
	1,662.26	133.12	22.76	97.33	91.65	279.49	1,017.53	7/20/26 - 7/22/26	No
	735.05	56.95	10.56	45.15	-	50.99	571.40	7/20/26 - 7/22/26	No
	1,024.04	100.52	13.94	59.58	45.54	109.32	695.14	7/20/26 - 7/22/26	No
	2,076.92	356.62	29.40	125.71	69.61	54.78	1,440.81	7/20/26 - 7/22/26	No
	2,784.25	357.81	37.34	159.65	111.72	467.66	1,650.07	7/20/26 - 7/22/26	No
	631.62	45.28	9.06	38.74	-	47.33	491.21	7/20/26 - 7/22/26	No
	1,153.85	121.25	15.71	67.18	-	140.28	809.43	7/20/26 - 7/22/26	No
	1,038.46	115.29	14.77	63.14	-	69.83	775.44	7/20/26 - 7/22/26	No
	911.55	82.35	12.94	55.31	-	74.37	686.58	7/20/26 - 7/22/26	No
	1,157.54	127.46	16.79	71.81	44.30	115.76	781.42	7/20/26 - 7/22/26	No
	1,844.57	116.49	26.84	114.77	55.58	511.20	1,011.58	7/20/26 - 7/22/26	No
	1,203.50	149.78	17.46	74.66	50.90	60.17	850.52	7/20/26 - 7/22/26	No
	1,071.05	101.58	14.34	61.32	37.51	169.43	686.87	7/20/26 - 7/22/26	No
	1,842.12	272.54	25.70	109.86	71.00	301.13	1,053.79	7/20/26 - 7/22/26	No
	2,105.77	332.98	29.80	127.43	-	187.59	1,427.96	7/20/26 - 7/22/26	No
	1,383.30	110.81	20.07	85.82	-	41.50	1,125.11	7/20/26 - 7/22/26	No
	2,011.20	125.22	26.82	114.67	56.55	470.72	1,215.20	7/20/26 - 7/22/26	No
	1,586.54	74.47	22.04	94.22	-	176.93	1,218.89	7/20/26 - 7/22/26	No
	2,265.00	472.66	32.89	140.62	-	-	1,600.56	7/20/26 - 7/22/26	No
	1,220.77	89.57	17.71	75.74	54.17	38.65	939.33	7/20/26 - 7/22/26	No
	1,603.85	190.37	21.59	92.31	-	320.62	978.95	7/20/26 - 7/22/26	No
	2,330.88	354.38	31.29	133.80	-	313.93	1,497.48	7/20/26 - 7/22/26	No
	1,096.20	114.83	14.92	63.79	-	115.66	771.80	7/20/26 - 7/22/26	No
	744.23	43.61	10.44	44.65	23.85	39.75	564.23	7/20/26 - 7/22/26	No
	2,415.65	145.39	33.10	141.53	-	415.44	1,680.18	7/20/26 - 7/22/26	No
	996.00	83.92	13.28	56.78	36.38	145.73	659.92	7/20/26 - 7/22/26	No
	1,032.70	81.53	14.06	60.11	-	145.58	731.41	7/20/26 - 7/22/26	No
	783.75	63.66	11.07	47.34	-	44.53	617.15	7/20/26 - 7/22/26	No
	2,521.38	393.51	36.61	-	114.15	151.28	1,810.06	7/20/26 - 7/22/26	No
	1,906.16	103.06	23.26	99.48	-	430.84	1,249.51	7/20/26 - 7/22/26	No
	2,307.69	342.17	30.07	128.56	91.18	329.66	1,386.05	7/20/26 - 7/22/26	No
	1,865.77	280.82	25.90	110.75	63.90	175.89	1,208.50	7/20/26 - 7/22/26	No
	831.92	45.61	12.07	51.62	37.19	40.74	644.68	7/20/26 - 7/22/26	No
	575.59	47.40	7.83	33.47	-	70.26	416.63	7/20/26 - 7/22/26	No
	533.83	11.30	7.34	31.37	7.01	55.31	421.50	7/20/26 - 7/22/26	No
	912.29	59.77	13.23	56.59	-	84.85	697.85	7/20/26 - 7/22/26	No
	635.17	41.46	8.33	35.60	-	95.69	454.09	7/20/26 - 7/22/26	No
	470.25	27.28	6.74	28.84	13.17	46.85	347.37	7/20/26 - 7/22/26	No
	400.83	-	5.72	24.47	7.18	26.20	337.26	7/20/26 - 7/22/26	No
	721.65	59.72	10.25	43.85	-	65.60	542.23	7/20/26 - 7/22/26	No
	519.64	-	7.42	31.72	27.44	41.62	411.44	7/20/26 - 7/22/26	No
	595.19	18.80	8.63	36.91	-	35.71	495.14	7/20/26 - 7/22/26	No
	567.50	35.49	7.82	33.44	-	73.81	416.93	7/20/26 - 7/22/26	No
	574.52	28.28	8.33	35.62	-	41.45	460.85	7/20/26 - 7/22/26	No
	483.34	32.85	7.01	29.97	-	3.24	410.27	7/20/26 - 7/22/26	No
	467.36	28.13	6.78	28.98	12.00	27.90	363.57	7/20/26 - 7/22/26	No
	450.08	27.24	6.53	27.91	6.30	15.53	366.59	7/20/26 - 7/22/26	No
	725.93	58.94	10.16	43.45	-	81.58	531.80	7/20/26 - 7/22/26	No
	531.72	43.90	7.70	32.92	13.50	76.89	356.81	7/20/26 - 7/22/26	No
	1,439.04	163.77	18.04	77.14	-	287.49	892.61	7/20/26 - 7/22/26	No
	696.62	27.58	9.89	42.29	-	49.39	567.46	7/20/26 - 7/22/26	No
	507.02	37.44	6.57	28.07	-	93.73	341.21	7/20/26 - 7/22/26	No
	611.90	43.68	7.60	32.48	-	153.38	374.77	7/20/26 - 7/22/26	No
	413.48	-	5.99	25.59	-	16.74	365.17	7/20/26 - 7/22/26	No

NAME	GROSS PAY	FEDERAL INCOME - EMPLOYEE TAX	MEDICARE - EMPLOYEE TAX	SOCIAL SECURITY - EMPLOYEE TAX	WORKED IN STATE - EMPLOYEE	TOTAL VOLUNTARY DEDUCTIONS	NET PAY	PERIOD OF TIME	INSIDER
[redacted]	587.34	45.33	8.52	36.42	-	62.93	434.14	7/20/26 - 7/22/26	No
	413.58	20.77	5.79	24.75	-	32.52	329.76	7/20/26 - 7/22/26	No
	591.41	15.11	8.01	34.23	-	82.10	451.97	7/20/26 - 7/22/26	No
	474.61	-	6.59	28.19	-	45.76	394.07	7/20/26 - 7/22/26	No
	631.10	41.18	8.02	34.28	-	121.73	425.90	7/20/26 - 7/22/26	No
	513.11	31.37	6.30	26.92	19.94	131.32	297.26	7/20/26 - 7/22/26	No
	609.16	42.03	8.56	36.60	26.02	87.90	408.05	7/20/26 - 7/22/26	No
	1,290.54	153.31	16.10	68.84	-	261.88	790.41	7/20/26 - 7/22/26	No
	393.72	15.00	5.56	23.77	10.96	27.88	302.58	7/20/26 - 7/22/26	No
	1,950.89	286.94	28.39	121.40	-	241.01	1,273.15	7/20/26 - 7/22/26	No
	582.20	7.81	7.97	34.10	-	81.88	450.43	7/20/26 - 7/22/26	No
	511.69	-	7.42	31.73	-	54.64	417.90	7/20/26 - 7/22/26	No
	1,649.81	77.83	21.30	91.07	53.40	199.29	1,206.92	7/20/26 - 7/22/26	No
	2,011.96	213.17	29.23	124.99	-	131.07	1,513.50	7/20/26 - 7/22/26	No
	444.42	3.29	6.25	26.73	-	41.41	366.73	7/20/26 - 7/22/26	No
	847.98	-	12.05	51.52	-	78.43	705.98	7/20/26 - 7/22/26	No
	443.86	16.52	6.44	27.52	17.46	0.44	373.21	7/20/26 - 7/22/26	No
	508.25	32.57	7.27	31.08	-	44.03	393.29	7/20/26 - 7/22/26	No
	655.58	48.21	9.21	39.38	-	48.67	510.12	7/20/26 - 7/22/26	No
	558.10	31.07	7.04	30.08	-	89.59	400.32	7/20/26 - 7/22/26	No
	664.74	-	8.62	36.87	9.65	170.12	436.55	7/20/26 - 7/22/26	No
	576.99	8.82	8.09	34.60	-	134.36	391.13	7/20/26 - 7/22/26	No
	753.18	55.32	10.67	45.63	-	90.40	551.17	7/20/26 - 7/22/26	No
	664.70	51.44	9.64	41.22	23.21	36.75	502.44	7/20/26 - 7/22/26	No
	561.89	49.04	8.15	34.84	-	33.71	436.16	7/20/26 - 7/22/26	No
	488.80	-	6.97	29.81	13.95	44.98	393.09	7/20/26 - 7/22/26	No
	1,317.44	96.76	18.84	80.55	-	157.83	963.45	7/20/26 - 7/22/26	No
	676.67	46.94	9.30	39.77	28.48	103.30	448.89	7/20/26 - 7/22/26	No
	525.64	32.66	7.29	31.17	13.80	62.34	378.37	7/20/26 - 7/22/26	No
	670.92	46.52	9.05	38.70	24.77	98.67	453.21	7/20/26 - 7/22/26	No
	697.57	12.77	9.88	42.23	-	126.05	506.63	7/20/26 - 7/22/26	No
	891.27	93.01	12.63	54.01	-	92.11	639.51	7/20/26 - 7/22/26	No
	530.42	32.29	7.32	31.32	-	83.00	376.49	7/20/26 - 7/22/26	No
	828.65	80.48	12.02	51.39	-	74.58	610.18	7/20/26 - 7/22/26	No
	1,516.00	177.98	21.07	90.07	-	161.23	1,065.66	7/20/26 - 7/22/26	No
	1,406.54	156.35	20.08	85.86	57.12	235.44	845.18	7/20/26 - 7/22/26	No
	843.92	44.56	11.96	51.11	31.76	84.12	620.41	7/20/26 - 7/22/26	No
	672.09	42.14	8.72	37.26	-	132.56	451.41	7/20/26 - 7/22/26	No
	746.62	58.37	10.20	43.62	-	142.72	491.71	7/20/26 - 7/22/26	No
	677.02	30.00	9.82	41.98	23.82	74.47	493.64	7/20/26 - 7/22/26	No
	661.04	49.42	9.59	40.99	-	40.38	520.66	7/20/26 - 7/22/26	No
	527.19	34.32	7.64	32.69	-	32.64	419.91	7/20/26 - 7/22/26	No
	458.10	27.62	6.64	28.40	-	18.32	377.11	7/20/26 - 7/22/26	No
	599.12	40.70	8.48	36.25	-	67.11	446.58	7/20/26 - 7/22/26	No
	536.98	6.14	6.74	28.84	-	134.31	360.93	7/20/26 - 7/22/26	No
	557.77	30.96	7.27	31.07	13.20	90.16	385.12	7/20/26 - 7/22/26	No
	655.45	-	8.60	36.74	-	117.67	492.44	7/20/26 - 7/22/26	No
	481.79	29.77	6.99	29.87	-	24.09	391.07	7/20/26 - 7/22/26	No
	627.16	7.50	7.82	33.42	-	124.40	454.02	7/20/26 - 7/22/26	No
	547.23	15.26	7.55	32.29	21.71	104.39	366.03	7/20/26 - 7/22/26	No
	625.91	-	8.70	37.22	19.45	106.95	453.59	7/20/26 - 7/22/26	No
	1,785.61	373.50	25.63	109.60	78.16	211.73	987.00	7/20/26 - 7/22/26	No
	479.40	4.69	6.95	29.72	14.75	20.90	395.19	7/20/26 - 7/22/26	No
	-	-	-	-	-	-	-	7/20/26 - 7/22/26	No
	707.48	25.34	9.99	42.74	-	18.36	611.05	7/20/26 - 7/22/26	No
	757.20	55.16	10.68	45.68	-	72.58	573.10	7/20/26 - 7/22/26	No
	570.30	39.18	8.27	35.36	-	34.22	453.28	7/20/26 - 7/22/26	No
	236.74	-	3.43	14.68	5.80	14.21	198.63	7/20/26 - 7/22/26	No
	451.52	29.46	6.27	26.82	16.32	65.70	306.95	7/20/26 - 7/22/26	No
	440.63	24.56	6.07	25.96	16.82	33.29	333.93	7/20/26 - 7/22/26	No
	1,412.68	165.00	19.54	83.54	33.99	180.36	930.24	7/20/26 - 7/22/26	No
	725.59	58.27	10.08	43.10	30.94	95.84	487.36	7/20/26 - 7/22/26	No
	558.31	41.84	7.73	33.06	16.67	59.77	399.25	7/20/26 - 7/22/26	No
	256.28	6.28	3.72	15.89	3.77	7.69	218.93	7/20/26 - 7/22/26	No
	454.55	28.63	6.17	26.40	15.92	60.41	317.02	7/20/26 - 7/22/26	No
	411.72	11.45	5.48	23.42	-	78.21	293.16	7/20/26 - 7/22/26	No
	1,038.14	42.44	12.67	54.17	20.48	245.63	662.76	7/20/26 - 7/22/26	No
	430.46	23.92	6.24	26.69	-	32.15	341.45	7/20/26 - 7/22/26	No
	1,206.88	93.54	16.28	69.58	30.97	177.68	803.09	7/20/26 - 7/22/26	No
	550.33	28.89	7.01	29.97	18.90	99.98	365.59	7/20/26 - 7/22/26	No
	551.00	50.58	6.92	29.60	21.55	108.42	333.93	7/20/26 - 7/22/26	No
	527.17	37.28	7.54	32.26	22.92	7.49	419.68	7/20/26 - 7/22/26	No
	319.52	-	4.64	19.81	10.46	15.98	268.64	7/20/26 - 7/22/26	No
	446.26	1.87	5.98	25.58	-	64.56	348.26	7/20/26 - 7/22/26	No
	460.97	24.22	6.37	27.22	16.66	51.31	335.20	7/20/26 - 7/22/26	No

NAME	GROSS PAY	FEDERAL INCOME - EMPLOYEE TAX	MEDICARE - EMPLOYEE TAX	SOCIAL SECURITY - EMPLOYEE TAX	WORKED IN STATE - EMPLOYEE	TOTAL VOLUNTARY DEDUCTIONS	NET PAY	PERIOD OF TIME	INSIDER
[redacted]	411.48	17.28	5.48	23.45	13.33	61.54	290.39	7/20/26 - 7/22/26	No
	1,194.16	163.80	17.11	73.16	-	195.76	744.32	7/20/26 - 7/22/26	No
	3,094.42	283.41	41.37	-	115.63	530.98	2,123.04	7/20/26 - 7/22/26	Yes
	463.51	27.69	6.72	28.74	18.32	23.18	358.87	7/20/26 - 7/22/26	No
	478.34	28.81	6.52	27.88	18.86	28.68	367.60	7/20/26 - 7/22/26	No
	1,641.52	73.57	23.59	100.87	68.02	114.99	1,260.48	7/20/26 - 7/22/26	No
	460.82	5.48	6.58	28.15	10.52	41.08	369.02	7/20/26 - 7/22/26	No
	477.28	25.48	6.53	27.94	17.26	56.47	343.60	7/20/26 - 7/22/26	No
	1,258.97	164.85	17.24	73.70	76.16	146.59	780.44	7/20/26 - 7/22/26	No
	375.28	16.96	5.31	22.69	6.26	35.05	289.01	7/20/26 - 7/22/26	No
	989.43	83.78	14.43	61.71	43.72	135.74	650.05	7/20/26 - 7/22/26	No
	1,629.79	96.59	22.39	95.75	-	150.09	1,264.98	7/20/26 - 7/22/26	No
	336.61	8.33	4.19	17.93	8.47	113.81	183.87	7/20/26 - 7/22/26	No
	345.25	15.04	5.01	21.41	12.26	10.36	281.18	7/20/26 - 7/22/26	No
	376.54	-	5.16	22.06	-	33.68	315.64	7/20/26 - 7/22/26	No
	1,702.80	143.95	23.35	99.85	43.20	376.95	1,015.51	7/20/26 - 7/22/26	No
	447.92	50.49	6.42	27.46	22.97	5.09	335.50	7/20/26 - 7/22/26	No
	156.23	4.50	2.27	9.69	5.95	14.97	118.85	7/20/26 - 7/22/26	No
	779.04	43.26	10.28	43.95	22.28	182.45	476.82	7/20/26 - 7/22/26	No
	585.17	17.27	8.49	36.28	21.16	84.14	417.85	7/20/26 - 7/22/26	No
	245.51	-	3.56	15.22	3.00	25.27	198.46	7/20/26 - 7/22/26	No
	559.73	42.89	7.99	34.16	22.75	47.77	404.17	7/20/26 - 7/22/26	No
	615.83	43.63	8.46	36.17	27.93	71.20	428.44	7/20/26 - 7/22/26	No
	470.33	30.95	5.75	24.58	14.18	114.25	280.62	7/20/26 - 7/22/26	No
	1,852.00	181.10	26.89	114.97	95.96	42.71	1,382.59	7/20/26 - 7/22/26	No
	1,387.69	163.32	19.07	81.53	71.81	162.29	872.20	7/20/26 - 7/22/26	No
	421.16	26.24	5.14	21.96	11.92	107.78	248.13	7/20/26 - 7/22/26	No
	415.92	-	5.61	23.96	-	61.46	324.89	7/20/26 - 7/22/26	No
	625.61	50.05	8.89	38.01	21.30	59.46	447.89	7/20/26 - 7/22/26	No
	603.44	15.81	8.21	35.08	16.46	107.63	420.26	7/20/26 - 7/22/26	No
	209.86	-	3.04	13.01	4.34	12.59	176.87	7/20/26 - 7/22/26	No
	384.27	4.26	3.65	15.59	-	166.76	194.03	7/20/26 - 7/22/26	No
	463.57	25.20	6.49	27.74	-	44.01	360.14	7/20/26 - 7/22/26	No
	414.12	15.02	6.00	25.67	15.10	12.42	339.91	7/20/26 - 7/22/26	No
	410.54	24.66	4.89	20.89	-	113.57	246.53	7/20/26 - 7/22/26	No
	441.26	35.28	6.25	26.72	16.25	47.64	309.12	7/20/26 - 7/22/26	No
	1,615.39	149.21	23.44	100.23	54.21	277.32	1,010.97	7/20/26 - 7/22/26	No
	1,497.39	52.18	21.74	92.94	21.80	-	1,308.73	7/20/26 - 7/22/26	No
	367.20	15.00	5.19	22.19	5.95	20.33	298.55	7/20/26 - 7/22/26	No
	502.73	20.86	6.69	28.61	10.80	75.75	360.02	7/20/26 - 7/22/26	No
	393.65	-	5.44	23.27	-	38.05	326.90	7/20/26 - 7/22/26	No
	1,305.07	78.07	18.09	77.34	-	142.54	989.03	7/20/26 - 7/22/26	No
	494.21	39.96	6.86	29.33	18.50	50.85	348.72	7/20/26 - 7/22/26	No
	433.31	21.98	6.01	25.69	15.58	45.01	319.05	7/20/26 - 7/22/26	No
	2,998.64	312.57	40.50	173.16	114.94	439.67	1,917.80	7/20/26 - 7/22/26	No
	1,492.22	133.63	21.65	92.59	45.81	65.43	1,116.53	7/20/26 - 7/22/26	No
	1,168.05	74.15	13.64	58.34	44.54	233.98	743.39	7/20/26 - 7/22/26	No
	259.75	-	3.77	16.10	10.60	16.97	206.33	7/20/26 - 7/22/26	No
	467.13	28.19	5.79	24.77	9.30	72.23	326.84	7/20/26 - 7/22/26	No
	2,308.44	227.39	30.76	131.53	87.21	371.39	1,460.17	7/20/26 - 7/22/26	No
	2,099.62	288.52	27.11	115.93	94.91	372.90	1,133.08	7/20/26 - 7/22/26	No
	382.42	22.09	5.21	22.26	12.77	44.47	275.63	7/20/26 - 7/22/26	No
	359.42	10.08	4.16	17.77	9.48	72.85	245.09	7/20/26 - 7/22/26	No
	301.11	-	4.27	18.24	9.05	37.53	232.02	7/20/26 - 7/22/26	No
	422.09	20.19	5.85	25.00	14.73	49.64	306.69	7/20/26 - 7/22/26	No
	67.97	-	0.99	4.22	-	0.68	62.09	7/20/26 - 7/22/26	No
	1,114.58	106.36	15.37	65.72	43.10	154.58	729.46	7/20/26 - 7/22/26	No
	458.68	22.30	6.13	26.22	-	71.78	332.25	7/20/26 - 7/22/26	No
	458.73	-	3.32	14.19	-	257.43	183.79	7/20/26 - 7/22/26	No
	1,165.45	146.25	15.93	68.12	42.69	137.49	754.97	7/20/26 - 7/22/26	No
	419.97	13.97	5.03	21.48	11.71	94.57	273.22	7/20/26 - 7/22/26	No
	460.73	29.90	5.61	24.00	13.67	101.22	286.33	7/20/26 - 7/22/26	No
	509.21	35.37	6.32	27.01	16.29	105.97	318.26	7/20/26 - 7/22/26	No
	412.29	11.72	5.98	25.56	15.76	22.53	330.75	7/20/26 - 7/22/26	No
	579.12	0.30	7.74	33.10	14.70	127.50	395.78	7/20/26 - 7/22/26	No
	354.87	-	5.15	22.00	9.89	10.65	307.19	7/20/26 - 7/22/26	No
	208.01	-	3.02	12.89	-	12.48	179.62	7/20/26 - 7/22/26	No
	1,161.27	40.76	15.61	66.75	-	158.46	879.70	7/20/26 - 7/22/26	No
	394.84	28.61	5.32	22.75	12.74	61.19	264.22	7/20/26 - 7/22/26	No
	517.27	33.20	7.50	32.07	13.96	31.04	399.50	7/20/26 - 7/22/26	No
	427.25	-	5.82	24.90	16.39	32.78	347.36	7/20/26 - 7/22/26	No
	474.42	25.25	6.50	27.80	17.15	55.67	342.05	7/20/26 - 7/22/26	No
	796.34	11.77	10.41	44.49	26.81	110.89	591.98	7/20/26 - 7/22/26	No
	472.89	7.15	6.63	28.35	11.48	29.87	389.42	7/20/26 - 7/22/26	No
	405.11	-	5.87	25.12	6.60	20.26	347.27	7/20/26 - 7/22/26	No

NAME	GROSS PAY	FEDERAL INCOME - EMPLOYEE TAX	MEDICARE - EMPLOYEE TAX	SOCIAL SECURITY - EMPLOYEE TAX	WORKED IN STATE - EMPLOYEE	TOTAL VOLUNTARY DEDUCTIONS	NET PAY	PERIOD OF TIME	INSIDER
[redacted]	463.02	-	6.33	27.07	-	29.23	400.39	7/20/26 - 7/22/26	No
	427.92	20.18	5.85	25.01	5.67	53.26	317.95	7/20/26 - 7/22/26	No
	394.46	-	5.72	24.46	7.32	23.67	333.29	7/20/26 - 7/22/26	No
	556.96	39.51	7.58	32.40	21.13	67.75	388.59	7/20/26 - 7/22/26	No
	316.32	-	4.59	19.61	3.10	18.98	270.04	7/20/26 - 7/22/26	No
	497.15	-	6.96	29.74	13.80	57.21	389.43	7/20/26 - 7/22/26	No
	537.24	34.63	6.97	29.81	18.80	93.97	353.06	7/20/26 - 7/22/26	No
	438.64	26.00	5.84	24.98	14.66	68.07	299.09	7/20/26 - 7/22/26	No
	1,215.84	105.02	16.28	69.62	29.06	295.01	700.85	7/20/26 - 7/22/26	No
	370.94	15.64	5.15	21.99	15.64	32.24	280.29	7/20/26 - 7/22/26	No
	286.98	19.13	4.16	17.79	3.08	17.22	221.87	7/20/26 - 7/22/26	No
	552.99	39.22	8.02	34.28	23.84	20.41	427.22	7/20/26 - 7/22/26	No
	408.26	21.88	5.92	25.31	12.53	16.33	321.32	7/20/26 - 7/22/26	No
	192.53	-	2.79	11.94	0.30	11.55	165.95	7/20/26 - 7/22/26	No
	405.91	18.36	5.61	23.99	12.08	51.26	294.60	7/20/26 - 7/22/26	No
	385.02	16.34	5.35	22.87	9.30	46.20	284.98	7/20/26 - 7/22/26	No
	466.92	33.74	6.77	28.95	24.74	28.01	344.71	7/20/26 - 7/22/26	No
	359.75	27.34	5.21	22.31	12.45	26.87	265.57	7/20/26 - 7/22/26	No
	546.92	13.97	5.73	24.50	6.84	201.06	294.80	7/20/26 - 7/22/26	No
	1,167.08	127.47	16.13	68.98	-	161.43	793.07	7/20/26 - 7/22/26	No
	501.30	24.85	7.27	31.08	13.10	38.52	386.48	7/20/26 - 7/22/26	No
	401.51	16.70	4.85	20.76	9.06	104.47	245.66	7/20/26 - 7/22/26	No
	323.36	-	4.61	19.73	0.90	71.34	226.77	7/20/26 - 7/22/26	No
	487.24	27.01	6.73	28.76	18.00	52.54	354.20	7/20/26 - 7/22/26	No
	459.67	22.72	6.19	26.44	15.94	64.95	323.44	7/20/26 - 7/22/26	No
	1,165.22	131.92	16.42	70.22	71.46	110.86	756.48	7/20/26 - 7/22/26	No
	1,640.12	91.28	21.60	92.37	-	508.73	926.15	7/20/26 - 7/22/26	No
	364.05	-	5.07	21.68	4.20	28.51	304.59	7/20/26 - 7/22/26	No
	442.74	24.11	6.21	26.55	16.60	32.27	337.00	7/20/26 - 7/22/26	No
	605.77	38.03	8.03	34.36	15.78	95.56	414.02	7/20/26 - 7/22/26	No
	413.47	16.13	4.63	19.79	9.93	139.28	223.71	7/20/26 - 7/22/26	No
	496.27	22.80	6.23	26.62	-	98.62	342.00	7/20/26 - 7/22/26	No
	427.58	-	5.95	25.43	15.11	43.10	338.00	7/20/26 - 7/22/26	No
	416.21	23.72	6.04	25.81	16.42	20.11	324.13	7/20/26 - 7/22/26	No
	353.69	12.11	4.76	20.34	3.65	75.73	237.12	7/20/26 - 7/22/26	No
	466.42	20.90	6.69	28.60	17.92	41.17	351.14	7/20/26 - 7/22/26	No
	404.92	20.52	5.87	25.10	7.89	28.61	316.92	7/20/26 - 7/22/26	No
	361.80	-	5.25	22.43	10.01	20.16	298.55	7/20/26 - 7/22/26	No
	249.40	9.83	3.62	15.46	6.48	14.96	199.05	7/20/26 - 7/22/26	No
	1,254.80	81.28	17.69	75.63	36.97	131.18	912.05	7/20/26 - 7/22/26	No
	307.55	7.50	4.46	19.07	6.96	14.89	254.68	7/20/26 - 7/22/26	No
	365.23	27.95	5.30	22.64	12.74	21.92	274.68	7/20/26 - 7/22/26	No
	1,159.10	141.00	15.43	65.97	38.42	223.20	669.98	7/20/26 - 7/22/26	No
	674.14	-	9.21	39.40	-	107.92	517.61	7/20/26 - 7/22/26	No
	665.08	41.86	8.68	37.10	24.85	109.96	442.63	7/20/26 - 7/22/26	No
	562.82	29.51	7.10	30.33	-	119.70	376.18	7/20/26 - 7/22/26	No
	829.74	68.64	11.96	51.14	-	54.88	643.12	7/20/26 - 7/22/26	No
	1,477.55	183.25	21.42	91.59	-	131.38	1,049.92	7/20/26 - 7/22/26	No
	547.97	40.61	7.94	33.98	21.32	-	441.72	7/20/26 - 7/22/26	No
	2,067.92	270.97	27.23	116.41	-	471.61	1,181.71	7/20/26 - 7/22/26	No
	1,096.16	16.95	15.71	67.15	-	46.56	949.79	7/20/26 - 7/22/26	No
	415.39	24.70	6.02	25.76	16.89	-	342.02	7/20/26 - 7/22/26	No
	5,480.77	1,690.86	76.83	-	333.86	598.70	2,732.83	7/20/26 - 7/22/26	Yes
	753.58	57.20	10.94	46.75	-	92.56	546.14	7/20/26 - 7/22/26	No
	925.46	19.04	12.97	55.46	-	46.05	791.93	7/20/26 - 7/22/26	No
	768.00	59.30	10.88	46.49	31.32	178.51	441.50	7/20/26 - 7/22/26	No
	1,985.80	84.65	25.30	108.18	72.34	392.84	1,302.49	7/20/26 - 7/22/26	No
	2,538.46	438.79	36.57	156.38	-	248.26	1,658.47	7/20/26 - 7/22/26	No
	1,668.60	121.51	23.32	99.71	66.78	361.74	987.98	7/20/26 - 7/22/26	No
	1,472.89	198.71	21.09	90.19	60.80	112.60	989.49	7/20/26 - 7/22/26	No
	2,906.25	331.27	39.83	170.30	-	456.57	1,908.29	7/20/26 - 7/22/26	No
	2,166.78	341.43	30.37	129.85	-	214.58	1,450.55	7/20/26 - 7/22/26	No
	578.13	63.44	7.25	30.99	-	113.02	363.44	7/20/26 - 7/22/26	No
	835.97	66.84	11.84	50.64	-	69.58	637.05	7/20/26 - 7/22/26	No
	835.97	-	10.04	42.91	30.80	200.43	551.80	7/20/26 - 7/22/26	No
	4,615.39	849.24	67.02	-	256.98	20.90	3,379.66	7/20/26 - 7/22/26	No
	984.23	96.93	13.96	59.69	41.53	80.96	678.52	7/20/26 - 7/22/26	No
	2,215.39	352.19	31.06	132.80	83.70	225.44	1,390.19	7/20/26 - 7/22/26	No
	573.77	16.27	8.24	35.26	-	49.85	464.14	7/20/26 - 7/22/26	No
	1,183.85	118.67	15.57	66.56	47.29	182.45	747.84	7/20/26 - 7/22/26	No
	928.54	85.06	13.13	56.14	-	94.40	679.82	7/20/26 - 7/22/26	No
	1,000.07	66.95	13.45	57.50	-	275.00	587.18	7/20/26 - 7/22/26	No
	1,903.85	178.30	26.01	111.22	-	177.67	1,410.65	7/20/26 - 7/22/26	No
	728.59	13.19	10.57	45.18	-	39.24	620.41	7/20/26 - 7/22/26	No
	692.66	-	8.84	37.83	-	110.40	535.59	7/20/26 - 7/22/26	No

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[redacted]	624.00	-	9.05	38.69	23.21	52.84	500.21	7/20/26 - 7/22/26	No
	1,245.96	145.18	17.01	72.72	55.80	163.61	791.65	7/20/26 - 7/22/26	No
	757.22	64.25	10.80	46.19	22.87	12.31	571.88	7/20/26 - 7/22/26	No
	1,177.02	148.30	17.00	72.70	-	50.60	888.42	7/20/26 - 7/22/26	No
	2,432.02	438.11	34.32	146.76	115.50	81.36	1,615.96	7/20/26 - 7/22/26	No
	2,018.08	265.03	28.25	120.82	-	374.76	1,229.22	7/20/26 - 7/22/26	No
	1,055.20	128.40	14.65	62.63	49.67	103.73	682.58	7/20/26 - 7/22/26	No
	1,109.64	99.14	13.89	59.40	-	207.17	730.03	7/20/26 - 7/22/26	No
	1,015.39	110.15	14.42	61.64	39.46	53.13	736.59	7/20/26 - 7/22/26	No
	1,151.32	130.42	16.31	69.75	-	96.10	838.74	7/20/26 - 7/22/26	No
	2,596.16	471.17	36.32	155.30	142.33	93.75	1,685.87	7/20/26 - 7/22/26	No
	1,382.31	62.75	20.06	85.76	-	253.14	960.60	7/20/26 - 7/22/26	No
	2,142.98	368.53	31.10	132.96	-	276.17	1,334.23	7/20/26 - 7/22/26	No
	539.22	35.13	7.52	32.15	-	44.77	419.67	7/20/26 - 7/22/26	No
	672.41	11.81	9.52	40.69	-	68.49	541.90	7/20/26 - 7/22/26	No
	3,498.32	626.20	48.51	207.44	147.90	374.55	2,093.72	7/20/26 - 7/22/26	No
	723.70	28.14	8.57	36.62	-	185.29	465.09	7/20/26 - 7/22/26	No
	1,840.96	174.95	26.79	114.54	69.12	382.75	1,064.36	7/20/26 - 7/22/26	No
	807.69	45.13	11.72	50.09	-	32.44	668.32	7/20/26 - 7/22/26	No
	620.09	21.47	8.69	37.16	-	39.54	513.23	7/20/26 - 7/22/26	No
	1,111.16	67.38	14.70	62.87	-	134.61	831.59	7/20/26 - 7/22/26	No
	535.19	-	7.52	32.16	-	70.92	424.60	7/20/26 - 7/22/26	No
	500.37	29.35	6.80	29.09	12.60	56.74	365.79	7/20/26 - 7/22/26	No
	466.03	16.88	6.76	28.89	14.30	134.01	265.19	7/20/26 - 7/22/26	No
	579.38	-	8.40	35.92	-	22.94	512.12	7/20/26 - 7/22/26	No
	807.69	14.31	10.90	46.62	-	59.66	676.20	7/20/26 - 7/22/26	No
	719.60	-	9.34	39.95	-	123.60	546.71	7/20/26 - 7/22/26	No
	1,033.85	118.84	15.00	64.13	33.76	37.23	754.54	7/20/26 - 7/22/26	No
	628.65	-	8.20	35.08	-	95.80	489.58	7/20/26 - 7/22/26	No
	622.00	-	8.93	38.19	-	6.16	568.72	7/20/26 - 7/22/26	No
	439.23	24.92	6.37	27.23	11.10	26.23	343.37	7/20/26 - 7/22/26	No
	666.57	-	9.35	39.96	-	36.00	581.27	7/20/26 - 7/22/26	No
	833.94	74.81	11.99	51.26	26.70	33.53	635.65	7/20/26 - 7/22/26	No
	507.12	26.44	6.46	27.60	8.60	88.02	350.01	7/20/26 - 7/22/26	No
	674.86	49.13	9.26	39.59	22.25	157.53	397.11	7/20/26 - 7/22/26	No
	546.53	35.98	7.63	32.60	-	37.12	433.20	7/20/26 - 7/22/26	No
	655.42	-	9.50	40.64	-	-	605.27	7/20/26 - 7/22/26	No
	551.12	15.20	7.99	34.17	-	27.56	466.20	7/20/26 - 7/22/26	No
	807.69	66.41	11.42	48.80	32.06	44.95	604.06	7/20/26 - 7/22/26	No
	807.69	65.72	11.33	48.45	32.67	51.34	590.37	7/20/26 - 7/22/26	No
	615.84	46.27	8.63	36.90	-	70.35	453.69	7/20/26 - 7/22/26	No
	807.69	37.93	10.66	45.59	-	98.93	614.59	7/20/26 - 7/22/26	No
	403.85	-	5.86	25.04	-	12.11	360.84	7/20/26 - 7/22/26	No
	730.91	54.26	10.34	44.20	-	117.56	504.56	7/20/26 - 7/22/26	No
	630.65	38.67	8.08	34.54	-	104.63	444.72	7/20/26 - 7/22/26	No
	1,512.60	216.24	20.92	89.45	-	70.97	1,115.03	7/20/26 - 7/22/26	No
	807.69	34.73	10.28	43.94	-	99.27	619.49	7/20/26 - 7/22/26	No
	532.29	-	7.72	33.00	22.21	28.09	441.28	7/20/26 - 7/22/26	No
	727.69	56.12	10.45	44.69	-	60.10	556.33	7/20/26 - 7/22/26	No
	634.61	30.44	7.27	31.08	-	178.07	387.76	7/20/26 - 7/22/26	No
	807.69	52.70	10.46	44.70	23.26	151.63	524.96	7/20/26 - 7/22/26	No
	557.80	38.37	8.00	34.20	18.00	28.47	430.76	7/20/26 - 7/22/26	No
	822.69	45.59	11.95	51.08	39.96	33.18	637.15	7/20/26 - 7/22/26	No
	638.11	47.65	9.07	38.80	-	32.37	510.22	7/20/26 - 7/22/26	No
	930.92	60.36	13.37	57.18	36.30	9.31	754.40	7/20/26 - 7/22/26	No
	502.57	-	6.05	25.89	-	117.96	352.67	7/20/26 - 7/22/26	No
	807.69	75.87	11.72	50.09	-	51.23	618.78	7/20/26 - 7/22/26	No
	618.45	35.63	7.88	33.71	22.13	111.98	407.13	7/20/26 - 7/22/26	No
	593.30	41.76	8.09	34.57	15.49	81.23	412.16	7/20/26 - 7/22/26	No
	685.25	45.44	8.79	37.59	-	127.25	466.19	7/20/26 - 7/22/26	No
	701.63	50.28	9.72	41.58	-	141.35	458.71	7/20/26 - 7/22/26	No
	807.69	66.40	11.42	48.80	25.20	54.60	601.28	7/20/26 - 7/22/26	No
	657.69	46.94	9.28	39.69	-	57.02	504.76	7/20/26 - 7/22/26	No
	630.65	-	9.10	38.93	-	22.28	560.33	7/20/26 - 7/22/26	No
	848.08	75.99	12.09	51.71	27.00	39.85	641.44	7/20/26 - 7/22/26	No
	840.00	74.55	11.98	51.20	27.00	39.60	635.68	7/20/26 - 7/22/26	No
	697.18	53.50	10.11	43.23	29.17	41.83	519.34	7/20/26 - 7/22/26	No
	250.80	5.26	3.64	15.55	-	16.58	209.77	7/20/26 - 7/22/26	No
	-	-	-	-	-	-	-	7/20/26 - 7/22/26	No
	6,250.00	249.92	43.35	162.84	65.02	658.20	5,070.68	7/16/26 - 7/22/26	Yes
	1,707.37	68.27	11.84	44.48	17.76	179.81	1,385.20	7/16/26 - 7/22/26	No
	1,291.67	51.65	8.96	33.65	13.44	136.03	1,047.94	7/16/26 - 7/22/26	No
	1,298.92	51.94	9.01	33.84	13.51	136.79	1,053.82	7/16/26 - 7/22/26	No
	2,804.92	112.16	19.45	73.08	29.18	295.39	2,275.65	7/16/26 - 7/22/26	No
	1,973.13	78.90	13.68	51.41	20.53	207.79	1,600.81	7/16/26 - 7/22/26	No

NAME	GROSS PAY	FEDERAL INCOME - EMPLOYEE TAX	MEDICARE - EMPLOYEE TAX	SOCIAL SECURITY - EMPLOYEE TAX	WORKED IN STATE - EMPLOYEE	TOTAL VOLUNTARY DEDUCTIONS	NET PAY	PERIOD OF TIME	INSIDER
[redacted]	2,108.88	84.33	14.63	54.95	21.94	222.09	1,710.95	7/16/26 - 7/22/26	No
	1,952.35	78.07	13.54	50.87	20.31	205.60	1,583.95	7/16/26 - 7/22/26	No
	2,083.34	83.31	14.45	54.28	21.67	219.40	1,690.23	7/16/26 - 7/22/26	No
	2,116.65	84.64	14.68	55.15	22.02	222.91	1,717.25	7/16/26 - 7/22/26	No
	2,106.72	84.24	14.61	54.89	21.92	221.86	1,709.19	7/16/26 - 7/22/26	No
	2,276.83	91.04	15.79	59.32	23.69	239.78	1,847.21	7/16/26 - 7/22/26	No
	2,291.67	91.64	15.89	59.71	23.84	241.34	1,859.25	7/16/26 - 7/22/26	No
	1,747.45	69.88	12.12	45.53	18.18	184.03	1,417.72	7/16/26 - 7/22/26	No
TOTAL	418,962.11						296,095.47		

Exhibit B

(Proposed Order)

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION
www.flmb.uscourts.gov

IN RE:	Chapter 11 Cases
TRAJECTOR HOLDINGS, LLC,[1]	Case No. 3:26-bk-_____
BENEFITS GROUP HOLDINGS, LLC,	Case No. 3:26-bk-_____
TRAJECTOR MEDICAL, LLC,	Case No. 3:26-bk-_____
INFINITE IP LLC,	Case No. 3:26-bk-_____
PERFECT PATH, LLC,	Case No. 3:26-bk-_____
TRAJECTOR ADMIN SERVICES, LLC,	Case No. 3:26-bk-_____
BENEFITS INSURANCE, LLC,	Case No. 3:26-bk-_____
MYLER INSURANCE SERVICES HOLDINGS, LLC,	Case No. 3:26-bk-_____
ANCHORSIX SERVICES, LLC,	Case No. 3:26-bk-_____
ATVANTAGE, LLC,	Case No. 3:26-bk-_____
TRAJECTOR MEDIA SERVICES, LLC,	Case No. 3:26-bk-_____
GLOBALTEK BPO LLC,	Case No. 3:26-bk-_____
MYLER DISABILITY HOLDINGS, LLC,	Case No. 3:26-bk-_____
MYLER DISABILITY, LLC,	Case No. 3:26-bk-_____
ADDUCO MEDIA, LLC,	Case No. 3:26-bk-_____
TRAJECTOR DISABILITY, LLC,	Case No. 3:26-bk-_____
CONTACT CENTER 1, LLC,	Case No. 3:26-bk-_____
BENEFITS KARMA, LLC,	Case No. 3:26-bk-_____

[1] The Debtors' mailing address is 5950 NW 1st Place, Suite 200, Gainesville, FL 32607. The last four digits of each Debtor's federal tax identification number are: (i) Trajector Holdings, LLC (7528); (ii) Benefits Group Holdings, LLC (2029); (iii) Trajector Medical, LLC (5243); (iv) Infinite IP LLC (3723); (v) Perfect Path, LLC (3494); (vi) Trajector Admin Services, LLC (2231); (vii) Benefits Insurance, LLC (9835); (viii) Myler Insurance Services Holdings, LLC (3606); (ix) AnchorSix Services, LLC (5009); (x) Atvantage, LLC (7384); (xi) Trajector Media Services, LLC (7509); (xii) Globaltek BPO LLC (1684); (xiii) Myler Disability Holdings, LLC (9924); (xiv) Myler Disability, LLC (0845); (xv) Adduco Media, LLC (0257); (xvi) Trajector Disability, LLC (5136); (xvii) Contact Center 1, LLC (2329); (xviii) Benefits Karma, LLC (1850); (xix) Executive Staffing Solutions, PLLC (1841); (xx) Ampry Holdings, LLC (2323); (xxi) Concierge Staffing Service Management, LLC (2814); and (xxii) Trajector, Inc. (2128).

EXECUTIVE STAFFING SOLUTIONS, PLLC,	Case No. 3:26-bk-_____
AMPRY HOLDINGS, LLC,	Case No. 3:26-bk-_____
CONCIERGE STAFFING SERVICE MANAGEMENT, LLC,	Case No. 3:26-bk-_____
TRAJECTOR, INC.,	Case No. 3:26-bk-_____
Debtors.	(Joint Administration Pending)

_____/

ORDER GRANTING DEBTORS' EMERGENCY MOTION FOR AN ORDER AUTHORIZING DEBTORS TO (I) PAY PREPETITION WAGES, SALARIES, EMPLOYEE BENEFITS, AND OTHER EMPLOYEE OBLIGATIONS, (II) MAINTAIN EMPLOYEE BENEFIT PROGRAMS, AND (III) FOR RELATED RELIEF

THIS CASE came before the Court for consideration on _____, at ____ a.m./p.m., upon the hearing (the "Hearing") to consider the *Debtors' Emergency Motion for an Order Authorizing Debtors to (i) Pay Prepetition Wages, Salaries, Employee Benefits, and Other Employee Obligations, (ii) Maintain Employee Benefit Programs and (iii) For Related Relief* (the "Motion") (Doc. No. ___) filed by the above-captioned debtors and debtors-in-possession (collectively, the "Debtors"), pursuant to sections 105(a) and 363(b) of title 11 of the United States Code (the "Bankruptcy Code"), Federal Rules of Bankruptcy Procedure 6003 (the "Bankruptcy Rules") and Local Rules[2] 2081-1(g)(3) and 9013-1(d), seeking the entry of an order (i) authorizing, but not directing, the Debtors to (a) pay prepetition wages, salaries, reimbursable expenses, and other obligations on account of the Compensation and Benefits Programs in the ordinary course of business as provided herein and (b) continue the Compensation and Benefits Programs, and (ii) granting related relief, as more fully set forth in the Motion. The Court, having considered the Motion and the First Day Declaration filed contemporaneously with the Motion, finding that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (b) venue is

[2] Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the Motion.

proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; (c) this matter is core proceeding pursuant to 28 U.S.C. § 157(b)(2); (d) the Court may enter an order consistent with Article III of the United States Constitution; (e) notice of the Motion and the Hearing thereon was sufficient under the circumstances and no other or further notice need be provided; (f) the Court having determined that the legal and factual bases set forth in the Motion, the First Day Declaration and at the Hearing establish just cause for the relief granted herein, and it appearing that the relief requested in the Motion is necessary to avoid immediate and irreparable harm to the Debtors and their estates as contemplated by Bankruptcy Rule 6003, and is in the best interests of the Debtors, their estates, their creditors, and all parties in interest; and upon the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor. Accordingly, it is

ORDERED as follows:

1. The Motion is **GRANTED**.

2. The Debtors are authorized, but not directed, pursuant to sections 105(a) and 363(b) of the Bankruptcy Code, to (i) pay Employee Obligations, (ii) maintain, honor, and continue the Compensation and Benefit Programs in the ordinary course of business and consistent with the Debtors' prepetition practices and (iii) modify, change, and discontinue any of their Compensation and Benefits Programs and to implement new programs, policies, and benefits for non-insider Employees in the ordinary course of business during these Chapter 11 Cases.

3. The Debtors are further authorized, but not directed, to remit all Payroll Taxes and Deductions to the appropriate third parties, as and when such obligations are due.

4. The Debtors are further authorized, but not directed, to continue the Non-Insider Severance Practice, but only with respect to non-Insider Employees whose employment with the Debtors terminates post-petition.

5. The Debtors are further authorized, but not directed, to continue the Employee Incentive Programs and honor obligations with respect to non-Insider Employees to the extent provided in the Motion.

6. Nothing contained in the Motion or this Order, nor any payment made pursuant to the authority granted by this Order, is intended to be or shall be construed as (i) an admission as to the validity of any claim against the Debtors; (ii) an agreement or obligation to pay any claims; (iii) a waiver of any claims or causes of action that may exist against any creditor or interest holder; (iv) a waiver of the Debtors' or any appropriate party in interest's rights to dispute any claim; or (v) an approval, assumption, or rejection of any agreement, contract, program, policy, or lease under section 365 of the Bankruptcy Code.

7. Except as otherwise set forth herein, nothing herein shall create, nor is intended to create, any rights in favor of or enhance the status of any claim held by any party.

8. The requirements of Bankruptcy Rule 6003(b) have been satisfied.

9. To the extent the Debtors make any payments on account of prepetition claims incurred with respect to any self-insured Health Insurance Programs, such payments shall be made without regard to the current employment status of the Employee (or dependent), provided that such Employee (or dependent) was eligible for coverage on the date such claim was incurred.

10. Notwithstanding any other provision of this Order, nothing in this Order shall authorize the Debtors to make any payment to, or on behalf of, any Employee or Independent Contractor on account of wages and other compensation obligations in excess of the statutory caps set forth in sections 507(a)(4) and (5) of the Bankruptcy Code.

11. Under the circumstances of these chapter 11 cases, notice of the Motion and Hearing are adequate under Bankruptcy Rule 6004(a).

12. Notwithstanding Bankruptcy Rule 6004(h), this Order shall be immediately effective and enforceable upon its entry.

13. The Debtors are authorized to take all reasonable actions necessary or appropriate to effectuate the relief granted in this Order.

14. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

# # #

(Attorney Edward Peterson is directed to serve a copy of this order on interested parties who do not receive service by CM/ECF and file a proof of service within three days of entry of the order.)