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-_____
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)

_____/

DEBTORS' EMERGENCY MOTION FOR ALLOWANCE OF AFFILIATE OFFICERS' SALARIES AND BENEFITS, EFFECTIVE AS OF THE PETITION DATE

[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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(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)(6). Of critical importance to the Debtors is continued payment of the Debtors' officer salaries and benefits. 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 motion (the "Motion"), pursuant to 11 U.S.C. §§ 105(a), 363(c)(1), and 507(a)(2), and Local Rule 2081-1(e) and (g)(6) of the Local Rules of the United States Bankruptcy Court for the Middle District of Florida, for entry of an interim order authorizing and approving the salaries and benefits of the Debtors' Co-Manager and Chief Executive Officer James S. Hill II ("Mr. Hill") and Co-Manager and Chief Medical Officer Gina Uribe ("Ms. Uribe," and together with Mr. Hill, the "Affiliate Officers"). In support of this 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 the Petition Date (defined below), and respectfully represent the following:

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), 363, and 507(a)(2) of chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"), and Rule 2081-1(g)(6) of the Local Rules of the United States Bankruptcy Court for the Middle District of

Florida.

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 Bankruptcy Code sections 1107(a) and 1108.

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.

The Affiliate Officers and Their Qualifications

7. Mr. Hill serves as Co-Manager and Chief Executive Officer of the Debtors and has been their principal executive officer since each company's inception. In his capacity as Co-Manager and CEO, Mr. Hill is responsible for the overall strategic direction, day-to-day operations, and management of the Debtors' enterprise.

8. Mr. Hill possesses extensive experience in business leadership, entrepreneurship, technology, and contracting. His career has been dedicated to building and scaling organizations that serve military veterans, and he brings deep institutional knowledge of the Debtors' operations, client relationships, technology platforms, regulatory environment, and organizational culture that cannot be replicated by any other individual.

9. Mr. Hill's specific responsibilities include, without limitation: (a) setting and executing the overall corporate strategy; (b) managing key partner relationships; (c) leading capital allocation and resource management decisions; (e) directing human capital strategy and organizational development; (f) serving as the primary interface with key stakeholders; and (g) assisting with the Debtors' restructuring efforts.

10. Ms. Uribe serves as Co-Manager and Chief Medical Officer of the Debtors. She co-founded the Debtors together with Mr. Hill and brings to the organization her experience as a nurse practitioner. She is familiar with the management of the Debtors.

11. Mr. Hill and Ms. Uribe directly or indirectly hold equity interests in all of the Debtors.[2] Accordingly, Mr. Hill and Ms. Uribe qualify as "affiliates" of the Debtors within the meaning of 11 U.S.C. § 101(2)(A), and as "insiders" within the meaning of 11 U.S.C. § 101(31)(B)(ii). Pursuant to Local Rule 2081-1(e), because Mr. Hill and Ms. Uribe are officers, their post-petition salaries and benefits must be approved by the Court in advance of payment.

12. Mr. Hill's continued leadership and management is indispensable to the Debtors' reorganization. His departure or reduction in compensation would pose a material risk to the Debtors' ability to maintain operations, preserve going-concern value, retain key employees, and develop and confirm a plan of reorganization. No other individual possesses the combination of institutional knowledge, industry relationships, technical expertise, and leadership capability with respect to the Debtors' businesses.

Compensation and Benefits

13. The Debtors propose to continue paying Mr. Hill and Ms. Uribe the following compensation and benefits, which are consistent with their prepetition compensation and commensurate with the compensation paid to officers of companies of comparable size and

[2] Mr. Hill holds approximately 44.67% of the equity interests in Debtor Trajector Holdings, LLC through his two affiliated entities – Blackfin Capital, LLC (42.43%) and Turner Raymond & Associates LLC (2.23%). Ms. Uribe holds approximately 44.67% of the Debtor Trajector Holdings, LLC's equity interest through her three affiliate entities – White Blaze Medical Consulting LLC (19.12%), Ginken Medical Consulting LLC (23.31%), and Venture Strategy LLC (2.23%). Trajector Holdings, LLC, in turn indirectly holds 100% of several of the Debtors through its wholly owned subsidiary, Debtor Benefits Group Holdings, LLC. Mr. Hill also holds 100% of the equity interests in Debtor Trajector, Inc. and holds 45% of the equity interests in Debtors Benefits Karma, LLC, Executive Staffing Solutions, PLLC, Ampry Holdings, LLC (through Blackfin Capital, LLC), and Concierge Staffing Service Management, LLC (through Blackfin Capital, LLC).

industry:

a. Base Salary

14. The Debtors propose to continue paying Mr. Hill a base salary of $600,000 per annum and Ms. Uribe a base salary of $197,000 per annum, payable in accordance with the Debtors' standard payroll practices. These base salaries are consistent with the Affiliate Officers' prepetition compensation and are within the range of base salaries paid to officers of similarly situated companies of the same size and scope as the Debtors.

b. Quarterly Executive Bonus

15. In the ordinary course of business, Mr. Hill is eligible to receive quarterly performance-based bonuses of up to $600,000, subject to the achievement of performance milestones.[3] By way of this Motion, the Debtors are not seeking authority to pay quarterly executive bonuses. Any performance bonus payment shall be subject to further Court approval.

c. 401(k) / Retirement Benefits

16. The Debtors propose to continue providing the Affiliate Officers with participation in the Debtors' 401(k) retirement savings plan, including a company matching contribution of up to six percent (6%) of base salary. Such benefits are provided on the same basis as to other eligible employees of the Debtors. In the past 12 months, the Debtors made 401(k) matching contributions of $30,534.15 for Mr. Hill and $11,874.06 in matching contributions for Ms. Uribe.

d. Health, Dental, and Vision Insurance

17. The Debtors propose to continue providing the Affiliate Officers with coverage under the Debtors' health plan, including comprehensive medical, dental, and vision insurance for the Affiliate Officers and their eligible dependents. Such benefits are provided on the same basis

[3] Ms. Uribe does not receive a quarterly executive bonus in the ordinary course of business.

to other eligible employees of the Debtors.

e. Life and Disability Insurance

18. The Debtors propose to continue providing the Affiliate Officers with long-term disability insurance and executive life insurance. These benefits align with industry standards for officers and are also provided on the same basis to other eligible employees of the Debtors.

f. Other Executive Benefits

19. The Debtors propose to continue to reimburse the Affiliate Officers for reasonable and customary expenses incurred in the scope of their employment, which is also afforded to other eligible employees of the Debtors. As of the Petition Date, the Debtors do not owe any amount for Reimbursable Expenses. However, by this Motion the Debtors request the authority, but not direction, to continue reimbursing Affiliate Officers for any reimbursable expenses in the ordinary course of business, regardless of whether they arose before or after the Petition Date.

g. Withholdings

20. The following amounts shall be withheld from the Affiliate Officers' compensation in accordance with applicable law:

i. Federal income tax withholding (at applicable rates);

ii. FICA taxes, including Social Security tax and Medicare tax;

iii. Employee contributions to health, dental, and vision insurance premiums, if any;

iv. 401(k) employee elective deferral contributions.

Legal Standard and Authority

21. Section 503(b)(1)(A) of the Bankruptcy Code provides that administrative expenses include "the actual, necessary costs and expenses of preserving the estate, including

wages, salaries, and commissions for services rendered after the commencement of the case." 11 U.S.C. § 503(b)(1)(A). Compensation paid to officers and employees whose continued service preserves the going-concern value of the estate constitutes an allowable administrative expense.

22. Section 363(c)(1) of the Bankruptcy Code authorizes a debtor in possession whose business is authorized to be operated under section 1108 to enter into transactions, including the payment of compensation, in the ordinary course of business without notice or a hearing.

23. Section 105(a) of the Bankruptcy Code empowers the Court 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). Courts have routinely exercised this authority to approve the continued payment of salary and benefits to key personnel whose services are necessary to preserve the value of the estate.

24. Federal Rule of Bankruptcy Procedure 6003 provides that within 21 days after the filing of a petition, the Court shall not grant a motion to pay prepetition claims except to the extent necessary to avoid immediate and irreparable harm to the estates. This Motion does not seek payment of prepetition claims, but rather seeks authorization for the payment of postpetition compensation retroactive to the Petition Date. To the extent Rule 6003 is applicable, the Debtors submit that failure to authorize the Affiliate Officers' compensation would cause immediate and irreparable harm to the estates by jeopardizing the Debtors' ability to retain their chief executive officer and maintain business operations.

Legal Argument

25. The continued payment of the Affiliate Officers' salaries and benefits are an actual and necessary cost of preserving the Debtors' estates within the meaning of section 503(b)(1)(A) of the Bankruptcy Code. The Debtors submit that the following factors overwhelmingly support

the allowance of the Affiliate Officers' compensation:

26. ***Critical and Irreplaceable Role.*** Mr. Hill serves as the Co-Manager and Chief Executive Officer of the Debtors and has done so since their founding. He leads the Debtors' business strategy and the management team, and is also the steward of the Debtors' most significant relationships. His departure would cause catastrophic harm to the Debtors' reorganization prospects.

27. ***Institutional Knowledge.*** As a co-founder who has led the enterprise since its inception, Mr. Hill possesses irreplaceable institutional knowledge regarding the Debtors' technology platforms, contracts, client relationships, operational processes, and employee talent. This knowledge cannot be transferred to a replacement in any reasonable timeframe, particularly during the pendency of the Chapter 11 Cases.

28. ***Essential to Reorganization.*** Mr. Hill's active leadership is essential to the Debtors' ability to develop and confirm a plan of reorganization. Maintaining relationships with the Debtors' most substantial creditors, relationships that will be essential to negotiations for a plan, overseeing the development of a viable plan, and ensuring the continued delivery of business services to the Debtors' clients are all vital to a successful reorganization.

29. ***Preservation of Going-Concern Value.*** The Debtors' businesses depend upon the confidence of their clients, contracting partners, and employees that the Debtors will continue to perform at the highest levels during the pendency of these Chapter 11 Cases. Mr. Hill's continued presence and leadership is important to maintaining that confidence.

30. ***Reasonableness of Compensation.*** The proposed compensation is consistent with the Affiliate Officers' prepetition compensation and is reasonable in light of the size, complexity, and nature of the Debtors' businesses. The total proposed compensation package of approximately

$840,000 annually for both Affiliate Officers is within the range of compensation paid to officers of companies of comparable size in the veteran and disability services industries.

31. ***Market Competitiveness.*** In the absence of competitive compensation, the Affiliate Officers may be compelled to seek employment opportunities elsewhere. The proposed compensation is necessary to ensure that the Debtors can retain Mr. Hill's services in a competitive market for experienced executive talent in the veteran and disability services sectors.

32. In addition to performing the duties above, since the Petition Date, Mr. Hill will be required to expend a significant amount of time: (a) attending to bankruptcy matters; (b) communicating with significant creditors regarding the Chapter 11 Cases, (c) negotiating adequate protection with secured creditors; (d) assisting with the valuation of assets; (e) negotiating plan treatment with creditors; and (f) assisting with formulating a plan of reorganization. These additional duties did not exist prior to the Petition Date. In order to ensure the viability of the Debtors during the pendency of these Chapter 11 Cases, and satisfy the obligations to the Court, the Office of the United States Trustee, creditors, employees, and customers, Mr. Hill will have to work well in excess of forty (40) hours per week.

33. Further, the Debtors are currently able to meet their operating expenses and compensate the Affiliate Officers as set forth above. No payments will be made to the Affiliate Officers if the Debtors are unable to meet their current operating expenses, and no party will be prejudiced by the granting of this Motion.

Conclusion and Prayer for Relief

34. The Debtors submit that the continued payment of the Affiliate Officers' salaries and benefits, retroactive to the Petition Date, is necessary, reasonable, and in the best interests of the Debtors' estates, their creditors, and all parties in interest.

WHEREFORE, the Debtors respectfully request that this Court enter an order, substantially in the form attached hereto as **Exhibit A** (a) authorizing and approving the continued payment of salary and benefits to both James S. Hill II and Gina Uribe, as Affiliate Officers, in the amounts and on the terms set forth herein, effective as of the Petition Date and (b) granting such other and further relief as the Court deems just and proper.

Dated: July 23, 2026

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Proposed Counsel for the Debtors and Debtors-in-Possession

Exhibit A

(Proposed Order)

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION
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[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).

AMPRY HOLDINGS, LLC,	Case No. 3:26-bk-_____
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TRAJECTOR, INC.,	Case No. 3:26-bk-_____
Debtors.	(Joint Administration Pending)

_____/

INTERIM ORDER GRANTING DEBTORS' EMERGENCY MOTION FOR ALLOWANCE OF AFFILIATE OFFICERS' SALARIES AND BENEFITS, EFFECTIVE AS OF THE PETITION DATE

THIS CASE came before the Court on July ___, 2026, at ____ .m., in Jacksonville, Florida, for hearing (the "Hearing") upon the *Debtors' Emergency Motion for Allowance of Affiliate Officers' Salaries and Benefits, Effective as of the Petition Date* [Doc. No. ___] (the "Motion").[2] The Court, having considered the Motion, finds that: (i) it has jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. §§ 157 and 1334; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), and that this Court may enter a final order consistent with Article III of the Constitution; (iii) venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; (iv) the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors and other parties in interest; (v) notice of the Motion and the Hearing were appropriate under the circumstances and no other notice need be provided; and (vi) upon review of the record before the Court, including the legal and factual bases set forth in the Motion and the First Day Declaration and the statements made by counsel at the Hearing, good and sufficient cause exists to grant the relief requested. Accordingly, it is

ORDERED that:

1. The Motion is **GRANTED** on an interim basis through _____, 2026, pending the Continued Hearing (defined below).

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

2. The Debtors are authorized to pay Hill a base salary of $600,000 per annum and Ms. Uribe a base salary of $197,000 per annum, payable in accordance with the Debtors' standard payroll practices, plus 401(K) benefits; health, dental, vision, life, and disability insurance coverage; and reimbursement of business expenses.

3. The relief provided in this Order is conditioned upon the Debtors having sufficient cash remaining after the payment of current operating expenses.

4. A continued hearing will be conducted by the Court on _____, **2026, at _____ .m.** (the "Continued Hearing") **in Courtroom 4C, 4th Floor, Bryan Simpson United States Courthouse, 300 North Hogan Street, Jacksonville, FL 32202**. All parties may attend the hearing in person. Parties are directed to review Judge Brown's Procedures Governing Court Appearances (available at https://www.flmb.uscourts.gov/judges/brown/) for his policies and procedures for remote attendance at hearings by video or telephone via Zoom.

5. This Court retains jurisdiction with respect to all matters arising from or related to the implantation, interpretation, and enforcement of this Order.

# # #

(Attorney Edward J. Peterson is directed to serve a copy of this order on interested parties who do not receive service by CM/ECF and to file a proof of service within 3 days of entry of this order.)