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Samuel A. Khalil (*pro hac vice* pending)  
Matthew Brod (*pro hac vice* pending)  
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*Proposed Co-Counsel to the Debtors  
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*Proposed Co-Counsel to the Debtors  
and Debtors in Possession*

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

*In re*

**UNITED SITE SERVICES, INC., et al.,<sup>1</sup>**

Debtors.

Case No. 25-23630 (MBK)

Chapter 11

(Joint Administration Requested)

**APPLICATION FOR PRO HAC VICE  
ADMISSION OF MELANIE WESTOVER YANEZ**

The above-captioned debtors and debtors in possession (collectively, the “**Debtors**”), by and through their proposed co-counsel, Cole Schotz P.C. respectfully submit this application (the “**Application**”), for the *pro hac vice* admission of Melanie Westover Yanez, Esq. and represents as follows:

<sup>1</sup> The last four digits of the tax identification number of United Site Services, Inc. are 3887. A complete list of the Debtors in these chapter 11 cases (the “**Chapter 11 Cases**”), with each one’s tax identification number, principal office address and former names and trade names, is available on the website of the Debtors’ noticing agent at [www.veritaglobal.net/USS](http://www.veritaglobal.net/USS). The location of the principal place of business of United Site Services, Inc., and the Debtors’ service address for these Chapter 11 Cases is 118 Flanders St., Westborough, MA 01581.



1. On December 29, 2025, the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code, commencing the above captioned chapter 11 cases in the United States Bankruptcy Court for the District of New Jersey (the “**Court**”).

2. Melanie Westover Yanez, special counsel at the firm of Milbank LLP, has represented the Debtors in connection with these matters. Because of her familiarity with the facts and circumstances relevant to the Debtors in these matters, the Debtors request that Ms. Yanez be allowed to appear *pro hac vice* in the within matters.

3. As set forth in the Certification of Ms. Yanez, annexed hereto as **Exhibit A**, Ms. Yanez is a member in good standing of the bar of the State of New York. Ms. Yanez is not under suspension or disbarment by any court.

4. If admitted *pro hac vice*, Ms. Yanez has represented that she will adhere to the disciplinary jurisdiction of this Court.

WHEREFORE, it is respectfully requested that the Court grant the Debtors’ Application, pursuant to D.N.J. LBR 9010-1 and L. Civ. R. 101.1(c), to admit counsel *pro hac vice* in the above captioned matters.

Respectfully submitted,

**COLE SCHOTZ P.C.**  
Proposed Co-Counsel for Debtors and  
Debtors in Possession

By: /s/ Michael D. Sirota

Michael D. Sirota

Dated: December 29, 2025

**Exhibit A**

**MILBANK LLP**

Dennis F. Dunne (*pro hac vice* pending)  
Samuel A. Khalil (*pro hac vice* pending)  
Matthew Brod (*pro hac vice* pending)  
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*Proposed Co-Counsel to the Debtors  
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**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

*In re*

**UNITED SITE SERVICES, INC., et al.,<sup>1</sup>**  
Debtors.

Case No. 25-23630 (MBK)  
Chapter 11  
(Joint Administration Requested)

**CERTIFICATION OF MELANIE WESTOVER YANEZ IN  
SUPPORT OF APPLICATION FOR *PRO HAC VICE*  
ADMISSION OF MELANIE WESTOVER YANEZ, ESQ.**

MELANIE WESTOVER YANEZ, of full age, hereby certifies as follows:

1. I am an attorney at law duly admitted to practice before the Court of the State of New York, the District of Columbia, the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of New York, and special counsel at the firm of Milbank LLP, proposed co-counsel for the debtors and debtors in possession (the

<sup>1</sup> The last four digits of the tax identification number of United Site Services, Inc. are 3887. A complete list of the Debtors in these chapter 11 cases (the “**Chapter 11 Cases**”), with each one’s tax identification number, principal office address and former names and trade names, is available on the website of the Debtors’ noticing agent at [www.veritaglobal.net/USS](http://www.veritaglobal.net/USS). The location of the principal place of business of United Site Services, Inc., and the Debtors’ service address for these Chapter 11 Cases is 118 Flanders St., Westborough, MA 01581.

“**Debtors**”). I submit this Certification in support of the accompanying Application for my admission *pro hac vice*.

2. I was admitted to practice in the State of New York in 2005, the District of Columbia in 2006, the United States District Court for the Southern District of New York in 2006, and the United States District Court for the Eastern District of New York in 2006.

3. I am in good standing before the Courts in which I am admitted, and I have not been disbarred, suspended or disciplined by any court or administrative body. The name and address of the office maintaining the roll of members in good standing for the State of New York bar is Appellate Division, 3rd Department, Room 511, Albany, New York 12223. The name and address of the office maintaining the roll of members in good standing for the District of Columbia is 430 E Street, NW, Washington, DC 20001. The name and address of the office maintaining the roll of members in good standing for the United States District Court for the Southern District of New York is 500 Pearl Street, New York, New York 10007. The name and address of the office maintaining the roll of members in good standing for the United States District Court for the Eastern District of New York is 225 Cadman Plaza E, Brooklyn, NY 11201.

4. The Debtors filed the within Application for my *pro hac vice* admission in these matters due to my familiarity with the facts and circumstances relevant to its interests. If the Application is granted, I agree to abide by this Court’s local rules and to submit myself to the disciplinary jurisdiction of this Court.

5. I hereby designate the following member of the bar of this Court with whom the Court and opposing counsel may communicate regarding these cases: Michael D. Sirota, Esq.

6. For the foregoing reasons, I respectfully request my application for admission *pro hac vice* be granted.

7. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: December 29, 2025

/s/ Melanie Westover Yanez

**MILBANK LLP**

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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)
In Re:

Case No.: \_\_\_\_\_

Adv. No.: \_\_\_\_\_

Chapter: \_\_\_\_\_

Judge: \_\_\_\_\_

ORDER FOR ADMISSION PRO HAC VICE

The relief set forth on the following page is **ORDERED**.

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This matter having been brought before the Court on application for an Order For Admission Pro Hac Vice; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ.Proc.78, D.N.J. L.Civ.R.101.1 and D.N.J. LBR 9010-1, and good cause having been shown; it is

ORDERED that \_\_\_\_\_ be permitted to appear pro hac vice; provided that pursuant to D.N.J. L.Civ. R. 101.1(c)(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may sign and file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders. Unless otherwise permitted by the Court, local counsel must attend all hearings and proceedings before the Court, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$250.00 fee required by D.N.J. L. Civ. R. 101(c)(3) for pro hac vice admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address:

United States District Court  
District of New Jersey  
Martin Luther King, Jr. Federal Building  
50 Walnut Street  
Newark, N.J. 07102  
*Attention: Pro Hac Vice Admissions*

and it is further ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of its date of entry.

*rev.03/01/2024*