

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

GREENBERG TRAURIG, LLP

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-and-

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*Co-counsel to Bank of America, N.A., as Prepetition
ABL Agent and First-Out/Second-Out Agent*

In re:)	
)	Chapter 11
UNITED SITE SERVICES, INC., <i>et al.</i> , ¹)	
)	Case No. 25-23630 (MBK)
Debtors.)	
)	(Joint Administration Requested)

**APPLICATION FOR THE *PRO HAC VICE*
ADMISSION OF MATTHEW CATONE, ESQ.**

Bank of America, N.A., (the “**Prepetition ABL Agent and First-Out/Second-Out Agent**”), by and through its undersigned co-counsel, Greenberg Traurig, LLP, respectfully makes

¹ The last four digits of the tax identification number of United Site Services, Inc. are 3387. 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. 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 Road, Suite 1000, Westborough, MA 01581.



this application (the “**Application**”), for *pro hac vice* admission of Matthew Catone, and represents as follows:

1. On December 29, 2025, the above-captioned debtors and debtors-in-possession (the “**Debtors**”), filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, as amended the (“**Chapter 11 Cases**”) in the United States Bankruptcy Court for the District of New Jersey.

2. Mr. Catone is an associate of the firm Cahill Gordon & Reindel LLP, which maintains an office at 32 Old Slip, New York, NY 10005. Because of his familiarity with the facts and circumstances relevant to the Debtors in the within matter, the Prepetition ABL Agent and First-Out/Second-Out Agent requests that Mr. Catone be allowed to appear *pro hac vice* for the purposes of representing the Prepetition ABL Agent and First-Out/Second-Out Agent, as administrative and collateral agent to the Debtors’ prepetition revolving loan facility.

3. As set forth in the accompanying Declaration of Matthew Catone, Esq., Mr. Catone is a member in good standing of the bar of the State of New York. Mr. Catone is not under suspension or disbarment by any court.

4. If admitted *pro hac vice*, Mr. Catone has represented that he will adhere to the disciplinary jurisdiction of this Court. Mr. Catone also has represented that he will arrange with the New Jersey Lawyer’s Fund for Client Protection for payment of the applicable annual fee under New Jersey Court Rule 1:28-2(a) and shall pay the fee required by L. Civ. R. 101.1(c)(3) for *pro hac vice* admission to this Court.

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

Dated: December 29, 2025

Respectfully submitted,

/s/ Alan J. Brody

Alan J. Brody, Esq.

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**DECLARATION OF MATTHEW CATONE, ESQ. IN SUPPORT
OF APPLICATION FOR *PRO HAC VICE* ADMISSION**

MATTHEW CATONE, ESQ., of full age, hereby certifies as follows:

1. I am an attorney-at-law and an associate of the firm Cahill Gordon & Reindel LLP,
which maintains an office at 32 Old Slip, New York, NY 10005. Because of my familiarity with

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the facts and circumstances relevant to the above-captioned pending matter, Bank of America, N.A., (the “**Prepetition ABL Agent and First-Out/Second-Out Agent**”), an administrative agent and collateral agent to the debtors’ prepetition revolving loan facility and First-Out/Second-Out Credit Agreement (the “**Debtors**”), requests that I be allowed to appear *pro hac vice* for the purposes of representing the Prepetition ABL Agent and First-Out/Second-Out Agent in connection with the above-captioned bankruptcy case. I submit this Certification in support of the application for my admission *pro hac vice*.

2. I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing of the bar of the State of New York. I am in good standing before the court in which I am admitted, and I have not been disbarred, suspended or disciplined by any court or administrative body.

3. If the Application is granted, I agree to abide by this Court’s local rules, to submit myself to the disciplinary jurisdiction of this Court, and to make payment to the New Jersey Lawyer’s Fund for Client Protection as provided in New Jersey Court Rule 1:28-2(a) and to the District Court under L. Civ. R. 101.1(c)(3).

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

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/ Matthew Catone
Matthew Catone

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In re:

UNITED SITE SERVICES, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 25-23630 (MBK)
)

) (Joint Administration Requested)
)

**ORDER FOR ADMISSION *PRO HAC VICE*
OF MATTHEW CATONE, ESQ.**

The relief set forth on the following page, numbered 2 is hereby **ORDERED**.

¹ The last four digits of the tax identification number of United Site Services, Inc. are 3387. 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. 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 Road, Suite 1000, Westborough, MA 01581.

This matter having been brought before the Court on application (the “**Application**”) for entry of 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, Matthew Catone, Esq. 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 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.