

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

**Caption in Compliance with D.N.J. LBR 9004-1(a)**

Kevin M. Capuzzi (NJ No. 173442015)  
**BENESCH, FRIEDLANDER, COPLAN  
& ARONOFF LLP**

Continental Plaza II  
411 Hackensack Ave., 3rd Floor  
Hackensack, NJ 07601-6323  
Telephone: (302) 442-7010  
Email: kcapuzzi@beneschlaw.com

-and-

Seth J. Kleinman (*pro hac vice* forthcoming)  
Robin Evans (*pro hac vice* forthcoming)  
**BENESCH, FRIEDLANDER, COPLAN  
& ARONOFF LLP**

71 South Wacker Drive, Suite 1600  
Chicago, IL 60606 4637  
Telephone: (312) 212-4949  
Email: skleinman@beneschlaw.com  
revans@beneschlaw.com

*Counsel to UMB Bank, N.A.*

In re:

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

Debtors.

Chapter 11

Case No. 25-23630 (MBK)

Judge: Michael B. Kaplan

(Joint Administration Pending)

Hearing Date: 12/30/2025 at 10:00 a.m

**RE: D.I. 13**

<sup>1</sup> 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](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 Road, Suite 1000, Westborough, MA 01581.



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**RESERVATION OF RIGHTS OF UMB BANK, N.A. TO DEBTORS' MOTION  
FOR ENTRY OF INTERIM AND FINAL ORDERS (I) AUTHORIZING THE  
DEBTORS TO (A) OBTAIN POSTPETITION FINANCING AND (B) USE CASH  
COLLATERAL, (II) GRANTING LIENS AND PROVIDING SUPERPRIORITY  
ADMINISTRATIVE EXPENSE CLAIMS, (III) GRANTING ADEQUATE  
PROTECTION TO PREPETITION SECURED PARTIES; AND  
(IV) MODIFYING THE AUTOMATIC STAY**

UMB Bank, N.A. ("UMB"), in its capacity as collateral agent and administrative agent, by and through its undersigned counsel, hereby files this reservation of rights in response to the Debtors' *Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Superpriority Administrative Expense Claims, (III) Granting Adequate Protection to Prepetition Secured Parties; and (IV) Modifying the Automatic Stay* [ECF No. 13] (the "DIP Motion"), and in support thereof, respectfully states as follows:

1. On December 29, 2025 (the "Petition Date"), United Site Services, Inc. and its debtor affiliates (collectively, the "Debtors"), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.*, thereby commencing the above-captioned chapter 11 cases.

2. On the Petition Date, the Debtors filed the DIP Motion.

3. UMB is the collateral agent and administrative agent with respect to the Prepetition Amended Term Loan Credit Agreement.<sup>2</sup> UMB succeeded in this role on December 24, 2025. As such, UMB is continuing to review pertinent documents and the court filings in the above-captioned chapter 11 cases.

4. Among other things, the DIP Motion proposes granting certain liens, claims and payments for adequate protection for the Prepetition Secured Parties as further detailed in the DIP

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<sup>2</sup> Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to such terms in the DIP Motion.

Motion (the “Proposed Adequate Protection”). Given the recent timing of UMB’s appointment as successor agent, UMB hereby reserves all rights to object to the DIP Motion and the relief requested therein on any grounds, including with regard to the Proposed Adequate Protection, as may be appropriate up to the time of the hearing thereon and the granting of such relief on a final basis.

Dated: December 30, 2025  
Hackensack, New Jersey

**BENESCH, FRIEDLANDER, COPLAN  
& ARONOFF LLP**

/s/ Kevin M. Capuzzi  
Kevin M. Capuzzi (NJ No. 173442015)  
Continental Plaza II  
411 Hackensack Ave., 3rd Floor  
Hackensack, NJ 07601-6323  
Telephone: (302) 442-7010  
Email: kcapuzzi@beneschlaw.com

*-and-*

Seth J. Kleinman (*pro hac vice* pending)  
Robin Evans (*pro hac vice* pending)  
71 S. Wacker Drive, Suite 1600  
Chicago, Illinois 60606  
Telephone:  
Email: skleinman@beneschlaw.com  
revans@beneschlaw.com

*Counsel to UMB Bank, N.A.*

**CERTIFICATE OF SERVICE**

I, Kevin M. Capuzzi, hereby certify that on this 30<sup>th</sup> day of December, 2025, I caused the foregoing Reservation of Rights to be served by this Court's CM/ECF system.

/s/ Kevin M. Capuzzi  
Kevin M. Capuzzi (NJ No. 173442015)