



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

In re

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

Case No. 25-23630 (MBK)

Chapter 11

(Jointly Administered)

Order Filed on December 30, 2025

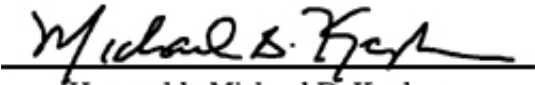
by Clerk

U.S. Bankruptcy Court
District of New Jersey

**INTERIM ORDER AUTHORIZING
THE DEBTORS TO (I) PAY PREPETITION EMPLOYEE
COMPENSATION AND BENEFITS AND (II) MAINTAIN
EMPLOYEE COMPENSATION AND BENEFIT PROGRAMS**

The relief set forth on the following pages, numbered three (3) through seven (7), is
ORDERED.

DATED: December 30, 2025


Honorable Michael B. Kaplan
United States Bankruptcy Judge

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.



252363025123000000000010

Caption in compliance with D.N.J. LBR 9004-1(b)

MILBANK LLP

Dennis F. Dunne (*pro hac vice* pending)
Samuel A. Khalil (*pro hac vice* pending)
Matthew Brod (*pro hac vice* pending)
Lauren C. Doyle (*pro hac vice* pending)
Benjamin M. Schak (*pro hac vice* pending)
55 Hudson Yards
New York, NY 10001
Telephone: 1 (212) 530-5000
DDunne@Milbank.com
SKhalil@Milbank.com
MBrod@Milbank.com
LDoyle@Milbank.com
BSchak@Milbank.com

- and -

COLE SCHOTZ P.C.

Michael D. Sirota
Felice R. Yudkin
Daniel J. Harris
Court Plaza North, 25 Main Street
Hackensack, NJ 07601
Telephone: 1 (201) 489-3000
MSirota@coleschotz.com
FYudkin@coleschotz.com
DHarris@coleschotz.com

*Proposed Co-Counsel to the Debtors
and Debtors in Possession*

(Page 3)

Debtors: United Site Services, Inc. *et al.*

Case No.: 25-23630 (MBK)

Caption of Order: Interim Order Authorizing the Debtors to (I) Pay Prepetition Employee Compensation and Benefits and (II) Maintain Employee Compensation and Benefit Programs

Upon the motion (the “**Motion**”)¹ of the above-captioned debtors (collectively, the “**Debtors**”) for entry of an interim order (this “**Interim Order**”) authorizing them to (a) continue to maintain, in the ordinary course, its Compensation and Benefits programs and (b) pay prepetition amounts owed in connection with the foregoing; and the Court having jurisdiction to decide the Motion and to enter this Interim Order pursuant to 28 U.S.C. § 1334; and these chapter 11 cases having been referred to this Court by standing order of the U.S. District Court for the District of New Jersey; and consideration of the Motion being a core proceeding pursuant to 28 U.S.C. § 157(b) upon which this Court may enter a final order consistent with Article III of the U.S. Constitution; and venue being proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided, such that no other or further notice is required or necessary under the circumstances; and the Court having determined that the legal and factual bases set forth in the Motion and in the record establish just cause for entry of this Interim Order; and it appearing that interim relief is justified to avoid immediate and irreparable harm to the Debtors’ estates; it is hereby **ORDERED** that:

1. The Motion is **GRANTED** on an interim basis as set forth herein.
2. A hearing to consider the Motion on a final basis shall be held on **February 3, 2026, at 10:00 a.m. (ET)**. Any objection or response to entry of an order granting the Motion on a final basis shall be filed by **January 27, 2026, at 4:00 p.m. (ET)**, and served so as to be actually received by (a) proposed co-counsel to the Debtors, (i) Milbank LLP, 55 Hudson Yards, New York, NY 10001 (Attn: Dennis F. Dunne (DDunne@Milbank.com), Samuel A. Khalil (SKhalil@Milbank.com), Matthew Brod (MBrod@Milbank.com), Lauren C. Doyle (LDoyle@Milbank.com), and Benjamin M. Schak (BSchak@Milbank.com)) and (ii) Cole Schotz P.C., Court Plaza North, 25 Main Street, Hackensack, NJ 07601 (Attn: Michael D. Sirota

¹ Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Motion.

(Page 4)

Debtors: United Site Services, Inc. *et al.*

Case No.: 25-23630 (MBK)

Caption of Order: Interim Order Authorizing the Debtors to (I) Pay Prepetition Employee Compensation and Benefits and (II) Maintain Employee Compensation and Benefit Programs

(MSirota@coleschotz.com), Felice R. Yudkin (FYudkin@coleschotz.com), and Daniel J. Harris (DHarris@coleschotz.com)); (b) the Office of the United States Trustee for Region 3, One Newark Center, Suite 2100, Newark, NJ 07102 (Attn: Jeffrey M. Sponder (Jeffrey.M.Sponder@usdoj.gov) and Samantha S. Lieb (Samantha.Lieb2@usdoj.gov)); (c) counsel to the Ad Hoc Group, (i) Akin Gump Strauss Hauer & Feld LLP, Robert S. Strauss Tower, 2001 K Street N.W., Washington, DC 20006 (Attn: Scott L. Alberino (SAlberino@AkinGump.com)) and 2300 N. Field Street, Ste. 1800, Dallas, TX 75201 (Attn: Zach Lanier (ZLanier@AkinGump.com)) and (ii) Pashman Stein Walder Hayden, P.C., 101 Crawfords Corner Road, Ste. 4202, Holmdel, NJ 07722 (Attn: John W. Weiss (JWeiss@PashmanStein.com)); and (d) counsel to any statutory committee appointed in these Chapter 11 Cases. If no such objection is timely filed and served, the Court may enter an order granting the Motion on a final basis without convening the hearing.

3. The Debtors are authorized, but not directed, on an interim basis, to continue to maintain, pay, honor or otherwise fulfill all Compensation and Benefits in the ordinary course, consistent with prepetition practices, as the same may be modified, amended, or supplemented from time to time in the ordinary course of business, subject to the priority cap and other limitations set forth in sections 507(a)(4) and (5) of the Bankruptcy Code with respect to prepetition Compensation that may be paid to an Employee. The Debtors shall provide five (5) calendar days' notice of any material changes to the Compensation and benefits and any other programs described in the Motion to the U.S. Trustee and any statutory committee(s) appointed in these Chapter 11 Cases.

4. The Debtors are authorized, but not directed, on an interim basis, to pay prepetition obligations incurred, directly or indirectly, relating to the Compensation and Benefits and related fees, costs, and expenses incident to the foregoing, including amounts owed to third-party administrators and taxing authorities; *provided that*, during the Interim Period, payments made to any Employee shall not exceed the amounts of the priority cap and other limitations set forth in sections 507(a)(4) and (5) of the Bankruptcy Code.

(Page 5)

Debtors: United Site Services, Inc. *et al.*

Case No.: 25-23630 (MBK)

Caption of Order: Interim Order Authorizing the Debtors to (I) Pay Prepetition Employee Compensation and Benefits and (II) Maintain Employee Compensation and Benefit Programs

5. Prior to entry of the Final Order, the Debtors shall not pay and nothing herein shall be deemed to authorize the payment of any prepetition amounts owed on account of the Non-Insider Retention Program.

6. Nothing in this Interim Order shall authorize the Debtors to make any payments to any Employees including “insiders” (as defined by section 101(31) of the Bankruptcy Code) of the Debtors on account of the Incentive Programs or Non-Insider Severance in contravention of section 503(c) of the Bankruptcy Code, in each case, without further order of this Court; *provided* that nothing herein shall prejudice the Debtors’ ability to seek approval of relief pursuant to Section 503(c) of the Bankruptcy Code under a separate motion at a later time.

7. Nothing in the Motion or this Interim Order shall constitute a determination by the Court as to whether any individual seeking payment pursuant to this Interim Order is or is not an “insider” as that term is defined in section 101(31) of the Bankruptcy Code.

8. This Interim Order does not implicitly or explicitly approve any bonus plan, incentive plan, severance plan or other plan covered by section 503(c) of the Bankruptcy Code.

9. The Debtors are authorized, but not directed, on an interim basis, to pay, in the ordinary course of business, all postpetition costs and expenses incidental to the Compensation and Benefits, including all administrative and processing costs and payment to third parties.

10. The Debtors are authorized, but not directed, on an interim basis, to forward any unpaid amounts on account of deductions, withholdings, taxes, or other amounts collected on behalf of another party to the appropriate taxing authorities or other recipient in accordance with the Debtors prepetition policies and practices.

11. Notwithstanding anything to the contrary herein, the Debtors are authorized, but not directed, on an interim basis, to pay any accrued but unused Employee Leave Benefits to any Employee whose employment terminates postpetition where the failure to do so would result in a violation of applicable federal, state, or foreign law.

(Page 6)

Debtors: United Site Services, Inc. *et al.*

Case No.: 25-23630 (MBK)

Caption of Order: Interim Order Authorizing the Debtors to (I) Pay Prepetition Employee Compensation and Benefits and (II) Maintain Employee Compensation and Benefit Programs

12. Nothing contained in the Motion or this Interim Order or any actions taken by the Debtors pursuant to the relief granted by this Interim Order is intended (and should not be construed) as: (a) an admission as to the amount of, basis for, priority, or validity of any particular claim under the Bankruptcy Code or applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type described in the Motion or any order granting the relief granted therein; (e) a request or authorization to assume, adopt, or reject any agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; (f) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on the property of, the Debtors' estates, and the Debtors expressly reserve their rights to contest the extent, validity, or perfection, or to seek avoidance of any and all liens, security interests, and other encumbrances; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) the granting of an administrative claim on account of any Compensation and Benefits obligation.

13. The banks and financial institutions on which checks were drawn or electronic payment requests made in payment of the Compensation and Benefits approved herein are authorized, to receive, process, honor, and pay all such checks and electronic payment requests when presented for payment, and all such banks and financial institutions are authorized, but not directed, to rely on the Debtors' designation of any particular check or electronic payment request as approved by this Interim Order.

14. Within two (2) business days of the entry of this Interim Order, the Debtors shall serve a copy of this Interim Order on each applicable bank and financial institution that is directed to comply with the terms of this Interim Order.

15. The Debtors are authorized and directed, on an interim basis, to issue or effectuate, as applicable, checks, wire transfers, ACH transfers, and other debits or electronic means, in

(Page 7)

Debtors: United Site Services, Inc. *et al.*

Case No.: 25-23630 (MBK)

Caption of Order: Interim Order Authorizing the Debtors to (I) Pay Prepetition Employee Compensation and Benefits and (II) Maintain Employee Compensation and Benefit Programs

replacement of any checks or fund transfer requests that are dishonored because of the filing of the Chapter 11 Cases with respect to prepetition amounts that are authorized to be paid under this Interim Order or any other order of the Court.

16. Nothing in this Interim Order authorizes the Debtors to accelerate any payments not otherwise due.

17. Notwithstanding anything to the contrary in this Interim Order, any payment made, or authorization contained, under this Interim Order, shall be subject to the “Approved Budget” as defined in the orders of the Court approving the debtor in possession financing in these Chapter 11 Cases.

18. Notice of the Motion as described therein shall be deemed good and sufficient notice of the Motion and the relief requested therein, and the requirements of Bankruptcy Rule 6004(a) and the Local Rules are satisfied by such notice.

19. Notwithstanding Bankruptcy Rule 6004(h) or any other provision of the Bankruptcy Rules or Local Rules, this Interim Order shall be effective and enforceable immediately upon its entry.

20. The Debtors shall serve this Interim Order, within 48 hours after its entry, by first class mail or email on the parties entitled to receive service pursuant to Local Rule 9013-5(f).

21. Any party may move for modification of this Interim Order in accordance with Local Rule 9013-5(e).

22. The Debtors and their agents are authorized to take all steps necessary or appropriate to carry out this Interim Order.

23. The Court retains jurisdiction over all matters arising from or related to the implementation, interpretation or enforcement of this Interim Order.