



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

*In re*

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

Case No. 25-23630 (MBK)

Chapter 11

(Jointly Administered)

Order Filed on December 30, 2025

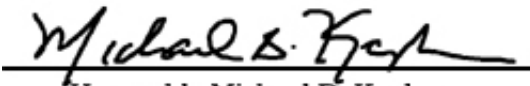
by Clerk

U.S. Bankruptcy Court  
District of New Jersey

**INTERIM ORDER  
(A) AUTHORIZING DEBTORS TO  
CONTINUE (I) MAINTAINING THEIR  
INSURANCE POLICIES, SURETY BONDS,  
AND PREMIUM FINANCING ARRANGEMENTS AND  
(II) PAYING INSURANCE OBLIGATIONS, INCLUDING  
THOSE INCURRED PREPETITION, (B) MODIFYING  
THE AUTOMATIC STAY WITH RESPECT TO WORKERS'  
COMPENSATION CLAIMS, AND (C) GRANTING RELATED RELIEF**

The relief set forth on the following pages, numbered three (3) through nine (9), is  
**ORDERED.**

**DATED: December 30, 2025**

  
Honorable Michael B. Kaplan  
United States Bankruptcy Judge

<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.



252363025123000000000016

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

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

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

Case No.: 25-23630 (MBK)

Caption of Order: Interim Order (A) Authorizing Debtors to Continue (I) Maintaining Their Insurance Policies, Surety Bonds, and Premium Financing Arrangements And (II) Paying Insurance Obligations, Including Those Incurred Prepetition, (B) Modifying the Automatic Stay with Respect to Workers' Compensation Claims, and (C) Granting Related Relief

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Upon the motion (the “**Motion**”)<sup>1</sup> of the above-captioned debtors (collectively, the “**Debtors**”) for entry of an interim order (this “**Interim Order**”) (a) authorizing them to continue: (i) maintaining their existing insurance, surety bond, and premium financing programs, and (ii) pay all Insurance Obligations, whether incurred pre- or postpetition, (b) modifying the automatic stay to permit employees to proceed with workers’ compensation claims, and (c) granting related relief; 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

<sup>1</sup> Capitalized terms used but not defined herein have the meanings ascribed to them in the Motion.

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

Case No.: 25-23630 (MBK)

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(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 (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 shall serve a copy of the Motion and this Interim Order on each affected counterparty listed on **Exhibits B, C and D** to the Motion within two (2) business days after the date this Interim Order is entered.

4. The Debtors are authorized, but not directed, on an interim basis, to maintain, perform, and satisfy obligations under their Insurance Policies, Premium Financing Arrangements, Surety Bonds, and Credit Support, in the ordinary course and consistent with the practices and procedures that were in effect on the Petition Date.

5. The Debtors are authorized, but not directed, on an interim basis, to honor their Insurance Obligations, including those incurred prior to the Petition Date in accordance with the same practices and procedures as were in effect prior on the Petition Date; *provided that*, during

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

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the Interim Period, the payment of prepetition Insurance Obligations shall not exceed \$20,000 in the aggregate (the “**Interim Cap**”).

6. The Debtors are authorized, but not directed, on an interim basis, to renew, supplement, modify, extend, reduce, purchase or enter into Insurance Policies, Surety Bonds, the Premium Financing Arrangements, and the Credit Support in the ordinary course of business, consistent with past practices; *provided* that to the extent the Debtors seek to enter into any new insurance premium financing agreements or provide additional credit support, other than as described in the Motion with respect to pending insurance renewals for 2026, the Debtors shall seek additional relief pursuant to section 364 of the Bankruptcy Code and approved by the Court; provided further that the Debtors shall provide five (5) calendar days' advance notice to counsel to the Ad Hoc Group, the U.S. Trustee and any official committee appointed in these cases of any modifications to the Insurance Policies, Surety Bonds, Premium Financing Arrangements, and Credit Support during the Chapter 11 Cases.

7. Except with respect to those policy renewals expressly described in the Motion for the 2026 policy period, the Debtors shall provide five (5) calendar days' advance notice to the Prepetition First-Out/Second-Out Agent, the ABL Agent, the U.S. Trustee and any official committee that may be appointed in these cases if the Debtors renew, supplement, modify, extend, reduce, increase or decrease existing insurance coverage, change Insurance Carriers or obtain additional coverage in a manner that would be materially inconsistent with the Debtors' current insurance coverage.

8. The Debtors shall provide the U.S. Trustee and any official committee that may be appointed in these cases with monthly reporting setting forth all payments on account of prepetition Insurance Obligations under this Interim Order.

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Case No.: 25-23630 (MBK)

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9. Subject to the terms of the DIP Financing Order (defined herein), the Debtors are authorized to pledge collateral to secure any renewed and new Premium Financing Arrangements and/or Credit Support in the ordinary course of business, to the extent described in the Motion.

10. The Debtors are authorized, but not directed, on an interim basis, to pay Broker Fees and Agent Fees, whether incurred or due and payable before or after the Petition Date and shall provide five (5) calendar days' advance notice to the U.S. Trustee and any official committee that may be appointed in these cases if the Debtors amend, supplement, change, or enter into new brokerage or claims administration agreements in connection with any Insurance Policies in the ordinary course of the Debtors' business and consistent with past practice.

11. Pursuant to section 362(d) of the Bankruptcy Code, (a) all current and former employees of the Debtors are authorized, but not directed, on an interim basis, to proceed with workers' compensation claims in the appropriate judicial or administrative forum, provided that the recoveries on any such claims shall be limited to the proceeds of the Debtors' workers' compensation insurance; (b) the Debtors and their Workers' Compensation Carriers are authorized to take all steps necessary or appropriate with respect to the resolution of any such claims, including by settling any such claims without further notice or hearing; and (c) the Workers' Compensation Carriers are authorized to make payments on any such claims without further notice or hearing.

12. The Debtors are authorized, but not directed, on an interim basis, with notice to any statutory committee that may be appointed in these Chapter 11 Cases, to (a) continue maintaining the Surety Bonds consistent with their prepetition practices in the ordinary course of business; (b) in consultation with the Ad Hoc Group, renew, revise, amend, supplement, or extend the Surety Bonds or purchase new Surety Bonds, as needed; and (c) pay any amounts owed in connection

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with the Surety Bonds, including any prepetition amounts that may be outstanding with respect thereto.

13. Nothing 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 requested herein; (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 concession of any liability to any workers' compensation claimant; or (h) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

14. The banks and financial institutions on which checks were drawn or electronic payment requests made in payment of the Broker Fees and Agent Fees approved herein are authorized and directed, 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.

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15. 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.

16. 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 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.

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

18. Notwithstanding anything to the contrary in this Interim Order, any payment made, or authorization contained, hereunder, 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.

19. Notice of the Motion as described therein shall be deemed good and sufficient notice of the Motion and the relief requested therein, and satisfies the requirements of Bankruptcy Rules 4001(a)(1), 9014(a) and all other Bankruptcy Rules and Local Rules, except that the requirements of Bankruptcy Rule 9006(d) are waived with respect to entry of this Interim Order on an interim basis.

20. Notwithstanding Bankruptcy Rules 4001(a)(4) and 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.

21. 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).



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

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

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