UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION
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IN RE:	Chapter 11 Cases
TRAJECTOR HOLDINGS, LLC,[1]	Case No. 3:26-bk-03286-JAB Lead Case
	Jointly Administered with
BENEFIT GROUP HOLDINGS, LLC,	Case No. 3:26-bk-03289-JAB
TRAJECTOR MEDICAL, LLC,	Case No. 3:26-bk-03291-JAB
INFINITE IP LLC,	Case No. 3:26-bk-03293-JAB
PERFECT PATH, LLC,	Case No. 3:26-bk-03295-JAB
TRAJECTOR ADMIN SERVICES, LLC,	Case No. 3:26-bk-03296-JAB
BENEFITS INSURANCE, LLC,	Case No. 3:26-bk-03297-JAB
MYLER INSURANCE SERVICES HOLDINGS, LLC,	Case No. 3:26-bk-03298-JAB
ANCHORSIX SERVICES, LLC,	Case No. 3:26-bk-03299-JAB
ATVANTAGE, LLC,	Case No. 3:26-bk-03300-JAB
TRAJECTOR MEDIA SERVICES, LLC,	Case No. 3:26-bk-03301-JAB
GLOBALTEK BPO LLC,	Case No. 3:26-bk-03302-JAB
MYLER DISABILITY HOLDINGS, LLC,	Case No. 3:26-bk-03304-JAB
MYLER DISABILITY, LLC,	Case No. 3:26-bk-03306-JAB
ADDUCO MEDIA, LLC,	Case No. 3:26-bk-03307-JAB
TRAJECTOR DISABILITY, LLC,	Case No. 3:26-bk-03308-JAB
CONTACT CENTER 1, LLC,	Case No. 3:26-bk-03309-JAB
BENEFITS KARMA, LLC,	Case No. 3:26-bk-03310-JAB
EXECUTIVE STAFFING SOLUTIONS, PLLC,	Case No. 3:26-bk-03311-JAB
AMPRY HOLDINGS, LLC,	Case No. 3:26-bk-03314-JAB
CONCIERGE STAFFING SERVICE MANAGEMENT, LLC,	Case No. 3:26-bk-03315-JAB
TRAJECTOR, INC.	
Debtors.	

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[1] The Debtors' mailing address is 5950 NW 1st Place, Suite 200, Gainesville, FL 32607. The last four digits of each Debtor's federal tax identification number are: (i) Trajector Holdings, LLC (7528); (ii) Benefits Group Holdings, LLC (2029); (iii) Trajector Medical, LLC (5243); (iv) Infinite IP LLC (3723); (v) Perfect Path, LLC (3494); (vi) Trajector Admin Services, LLC (2231); (vii) Benefits Insurance, LLC (9835); (viii) Myler Insurance Services Holdings, LLC (3606); (ix) AnchorSix Services, LLC (5009); (x) Atvantage, LLC (7384); (xi) Trajector Media Services, LLC (7509); (xii) Globaltek BPO LLC (1684); (xiii) Myler Disability Holdings, LLC (9924); (xiv) Myler Disability, LLC (0845); (xv) Adduco Media, LLC (0257); (xvi) Trajector Disability, LLC (5136); (xvii) Contact Center 1, LLC (2329); (xviii) Benefits Karma, LLC (1850); (xix) Executive Staffing Solutions, PLLC (1841); (xx) Ampry Holdings, LLC (2323); (xxi) Concierge Staffing Service Management, LLC (2814); and (xxii) Trajector, Inc. (2128).

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THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' LIMITED OBJECTION TO DEBTORS' EMERGENCY MOTION FOR ALLOWANCE OF AFFILIATE OFFICERS' SALARIES AND BENEFITS, EFFECTIVE AS OF THE PETITION DATE (AS TO GINA URIBE)

The Official Committee of Unsecured Creditors (the "Committee"), by and through its undersigned counsel, respectfully submits this limited objection (the "Objection") to Debtors' Emergency Motion for Allowance of Affiliate Officers' Salaries and Benefits, Effective as of the Petition Date (Docket No. 33, the "Motion") whereby Debtors seek an order authorizing and approving the salaries and benefits of the Debtors' Co-Manager and Chief Executive Officer James S. Hill II ("Hill") and Co-Manager and Chief Medical Officer Gina Uribe ("Uribe," and together with Mr. Hill, the "Affiliate Officers"). In support of this Objection, the Committee states its objection to the relief being sought as to Gina Uribe[2], as follows:[3]

PRELIMINARY STATEMENT

1. In the Motion, the Debtors originally sought to continue Uribe's service as Co-Manager and Chief Medical Officer in the above-captioned chapter 11 bankruptcy cases (the "Bankruptcy Cases") and asked this Court, pursuant to §§ 503, 363, and 105 of the Bankruptcy Code, for entry of an order authorizing them to continue paying her prepetition salary of $197,000 per annum and to continue providing her with accompanying benefits.

2. However, the Motion did not offer more than conclusory statements regarding Uribe's value to the Debtors, nor does it satisfy the statutory conditions for payments to insiders under §§ 503(c)(1) and 363(c) of the Bankruptcy Code.

[2] The Committee does not challenge the payment of Hill's salary at this time, as it appears based upon the representations made in the Motion and discussions with Mr. Hill and the CRO (defined below) that he is working full time on the Debtors' behalf and receiving a salary in the range commensurate with similarly titled officers at similar companies, provided he continues to work similar hours and perform similar duties and responsibilities throughout the case. Moreover, the Committee's decision not to object to Hill's post-petition salary does not affect its ability to investigate and challenge improper pre-petition payments made by any Debtors to Hill, regardless of the form of remuneration.

[3] Capitalized terms used but not otherwise defined herein shall have the meanings given to them in the Motion.

3. Because, it now appears to the Committee that Uribe is not presently actively engaged in the Debtors' business and contributing daily or regularly toward the medical operations, it is inappropriate to use estate funds to pay Uribe's salary and benefits, particularly at a six-figure clip.

4. Since the last hearing, the Committee has interviewed representatives of the Debtor and understands that Uribe is no longer providing any regular medical related or other services to the estate that justify a salary of almost $200,000 per annum.

5. As such, the Committee respectfully asks that this Court deny the Motion specifically in regard to Uribe's salary and benefits and order the Debtors to cease further payments to her during the remainder of the Bankruptcy Cases.

BACKGROUND

6. On July 23, 2026 (the "Petition Date"), the Debtors commenced the Bankruptcy Cases. The Debtors continue to manage their property as debtors in possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

7. On July 23, 2026, the Debtors filed the Motion, requesting that the Court approve the continued payment of salaries and benefits for the Affiliate Officers. In support of this motion, the Debtors noted that Hill served as the Debtors' CEO from their founding through the insolvency crisis that precipitated the Bankruptcy Cases; the Debtors further assert that Hill is "the steward of the Debtors' most significant relationships" and is in possession of "irreplaceable institutional knowledge" regarding various aspects of the Debtors' operations such that his departure "would cause catastrophic harm" to the Debtors. Motion ¶ 26–27.

8. By comparison, the Debtors' discussion of Uribe is striking in its lack of substance. The Debtors simply note that Uribe is the "Co-Manager and Chief Medical Officer," that she "co-

founded the Debtors together with Mr. Hill," and that she "brings to the organization her experience as a nurse practitioner" and "is familiar with the management of the Debtors." Motion ¶ 10. The Debtors provide no detail regarding her current contributions, make no allegation that she plays a key role in the Debtors' daily operations, and give no indication that her participation in the reorganization process is in any way critical to its success. In fact, it is unclear what specific responsibilities are currently allotted to Uribe, or indeed whether she is still actively engaged with the Debtors in any capacity.

9. Similarly, the Debtors offer no indication that Uribe is currently fielding competitive offers that could entice her to leave her current position. The paragraph devoted to the possibility of the Affiliate Officers leaving for greener pastures never mentions Uribe by name or title; it notes only that "the Affiliate Officers may be compelled to seek employment opportunities elsewhere" if they are not paid according to their current salaries before returning to the Debtors' refrain that "[t]he proposed compensation is necessary to ensure that the Debtors can retain Mr. Hill's services in a competitive market . . . ." Motion ¶ 31.

10. Contemporaneously with the Motion, the Debtors also filed an Emergency Application, Pursuant to Sections 105(a) and 363(b) of the Bankruptcy Code, for Authorization to Employ and Retain Mark C. Healy as Chief Restructuring Officer (Docket No. 35, the "CRO Application"). The Court formally appointed Mr. Healy (the "CRO") to this role in an order dated July 29, 2026 (Docket No. 73, the "CRO Order").

11. On July 28, 2026, the Court entered an interim order granting the Motion on a continuing basis (Docket No. 58, the "First Interim Order"); on September 29, 2026, the Court entered a second interim order granting the Motion on a continuing basis and setting a final hearing on the Motion for October 15, 2026 (Docket No. 287, the "Second Interim Order").

12. On August 17, 2026, the United States Trustee for the State of Florida (the "U.S. Trustee") formed the Committee. *See* Docket No. 111, as modified by Docket No. 227.

13. Upon initial review, the Committee had serious concerns about the relief requested in the Motion and reached out to the Debtors with numerous questions regarding the continued contributions of both Affiliate Officers. In an effort to answer these questions, the Committee's financial advisor, Accordion Partners, LLC ("Accordion"), scheduled meetings with the CRO and members of Debtors' management on September 30, 2026 (the "Meetings").

14. Hill attended some of the Meetings and answered the Committee's questions regarding his role in the restructuring. Based on his responses, the Committee has opted not to challenge Hill's continued salary, as it appears that he is working full-time on behalf of the Debtors and, further, his salary according to Accordion, appears to be within the normal range for the industry provided he continues to provide the same level of responsibility, effort and work throughout the case.

15. On Wednesday, October 7, 2026, counsel for the Committee met with the CRO and counsel for the Debtors to discuss Uribe's involvement. The CRO confirmed that based upon his investigation that Uribe does not had any specific responsibilities, nor do any of the Debtors' employees directly or indirectly report to her. This situation continues post-petition.

16. In fact, the CRO made it clear that the medical division of the Debtors' business is currently run entirely by two current staff members: Robin Hoon, Director of Medical Consulting; and Caitlin White, Medical Evidence Director. Neither Mr. Hoon nor Ms. White report to Uribe, nor do they rely on her judgment or advice in executing their duties.

17. It is clear to the Committee that Uribe is not currently working on behalf of the Debtors in any material capacity. Without concrete evidence of Uribe's current contributions to

the Debtors and to the bankruptcy estate, the Committee cannot agree to the use of estate resources to continue paying her salary.

LEGAL STANDARD

18. Section 363(c)(1) of the Bankruptcy Code authorizes debtors in possession to enter into transactions in the ordinary course of business. 11 U.S.C. § 363(c)(1). However, when such a transaction would inure to the benefit of insiders (as defined in 11 U.S.C. § 101),[4] bankruptcy courts must carefully consider whether the transaction should be considered "within the ordinary course of business" by comparing the proposed transaction to both industry standards and to the expectations of creditors—the so-called "horizontal and vertical" tests. *See, e.g.*, *In re MMH Motor Services, Inc.*, 259 B.R. 440, 449 (Bankr. S.D. Ga. 2000). If a transaction proposed by a debtor fails to satisfy either test, it must be rejected. *Id.*

19. Further, § 503(c) of the Bankruptcy Code limits a chapter 11 debtor's ability to compensate insiders during bankruptcy. 11 U.S.C. § 503(c). Under § 503(c)(1), a debtor may not make a payment to an insider to induce that person to remain with the business unless the court finds that: (1) the insider has a bona fide job offer from another business at the same or greater compensation; (2) the insider's services are essential to the debtor's survival; and (3) the payment falls within the statutory compensation limits. 11 U.S.C. § 503(c)(1)(A)–(C).

20. Finally, Section 105(a) authorizes a bankruptcy court to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions" of the Bankruptcy Code and to take appropriate action to enforce its orders or prevent an abuse of process. 11 U.S.C. § 105(a). Although this provision affords bankruptcy courts broad equitable authority, that authority

[4] The Debtors have acknowledged that Hill and Uribe constitute insiders pursuant to the statutory definition. Motion ¶ 11.

is limited to carrying out the provisions of the Bankruptcy Code and does not provide an independent basis to grant relief inconsistent with the Code.

ARGUMENT

I. The Transactions Contemplated in the Motion Are Prohibited By § 503(c)(1)

21. The Debtors have failed to meet the criteria imposed by § 503(c)(1) of the Bankruptcy Code. As such, the Motion should be denied in respect to Uribe.

22. First, § 503(c)(1)(A) requires a debtor to establish that the insider has a bona fide job offer from another business at the same or greater compensation—a requirement that has been described as "virtually impossible for debtors to meet." *In re Foothills Texas, Inc.*, 408 B.R. 573, 581 (Bankr. D. Del. 2009). Assuming that a debtor meets this exacting threshold, they must then demonstrate that the services provided by the insider "are essential to the debtor's survival" and that the proposed compensation falls within salary limits provided in § 503(c)(1)(C)(i) and (ii).

23. Here, the Debtors have not satisfied the requirements of § 503(c)(1) in the Motion.

24. First, rather than identify any potentially enticing employment offers currently under contemplation by Uribe, the Debtors merely state that the Affiliate Officers "may be compelled to seek employment opportunities elsewhere" if they are not paid their full prepetition salaries. Motion ¶ 30.

25. Second, the Debtors provide no evidence that Uribe is currently providing services that are in any way "essential to the survival of the business." In fact, the CRO has confirmed that Uribe is not providing *any* services to the Debtors at this point. *See* ¶ [] *supra*. She is in no way providing benefit to the bankruptcy estate, nor is her continued association with the Debtors "essential" to the Debtors' survival and reorganization.

26. The Debtors have thus failed to carry their burden under § 503(c) regarding Uribe. Until and unless they are able to do so, further payments to Uribe must be rejected by the Court.

II. The Transactions Contemplated in the Motion Are Not Within the Ordinary Course of Business Under § 363

27. Even if § 503(c) did not prevent the Debtors from paying Uribe's prepetition salary (which, as shown above, it does), the Debtors have not satisfied either of the two tests required to establish that such payments would qualify as ordinary course transactions under § 363.

28. When debtors propose a transaction under § 363(c) that would inure to the benefit of statutory insiders (as defined by 11 U.S.C. § 101), bankruptcy courts apply "two complementary tests, known as the horizontal and vertical tests, which provide the framework in analyzing whether a transaction falls in the 'ordinary course of business.'" *In re MMH Motor Services, Inc.*, 259 B.R. 440, 449 (Bankr. S.D. Ga. 2000).

29. The horizontal test ascertains "whether, from an industry-wide perspective, the transaction is of the sort commonly undertaken by companies in that industry." *In re Roth American, Inc.*, 975 F.2d 949, 953 (3d Cir. 1992) (citation omitted).

30. The vertical test, "more appropriately characterized as the creditor's expectation test," asks whether the transaction in question "subjects a creditor to economic risk of a nature different from those he accepted when he decided to extend credit," focusing on "the debtor's prepetition business practices and conduct" while keeping in mind "the changing circumstances inherent in the hypothetical creditor's expectations." *Id.* at 953 (citations omitted).

31. If a proposed transaction fails either the horizontal or vertical test, it should be rejected as being outside the ordinary course of business. *In re MMH Motor Services, Inc.*, 259 B.R. at 449.

32. Here, the Debtors have proposed to continue paying Uribe's prepetition salary without demonstrating that doing so satisfies either test.

33. As to the horizontal test, the Debtors have provided only a conclusory assertion that "[t]he total proposed compensation package . . . is within the range of compensation paid to officers of companies of comparable size in the veteran and disability services industries." Motion ¶ 30. At no point do they provide any evidence sufficient to justify this assertion regarding Uribe's salary.

34. Further, the Debtors have not demonstrated that paying Uribe's prepetition salary meets the vertical test (or, as the Third Circuit put it, "creditor's expectation test"). If anything, the CRO has confirmed that continuing to pay Uribe's salary and benefits out of estate funds cannot be justified since she has no current responsibilities and is in no way contributing to the restructuring efforts.

35. Until and unless the Debtors can provide justification sufficient to satisfy these tests regarding Uribe's salary, the Court should reject the Motion and direct the Debtors to cease paying her salary.

III. The Debtors Cannot Rely on § 105(a) to Circumvent the Requirements of Either § 503(c)(1) or § 363(c)

36. The Bankruptcy Code grants broad equitable authority to bankruptcy courts under § 105(a). However, courts in the Eleventh Circuit have repeatedly recognized that a bankruptcy court may not invoke § 105(a) to override the Code's specific statutory requirements. *See In re Cox*, 338 F.3d 1238, 1243 (11th Cir. 2003) (holding that the bankruptcy court's equitable powers do not allow it to override any specific statutory language); *In re Transit Group, Inc.*, 286 B.R.

811, (Bankr. M.D. Fla. 2002) ("As a general rule, however, the equitable powers of bankruptcy courts must be exercised within the confines of the Bankruptcy Code.").

37. Here, as demonstrated *supra*, the Debtors have failed to clear the statutory thresholds imposed by §§ 503(c) and 363(c) of the Bankruptcy Code. As such, they may not rely on this Court's equitable powers to circumvent the requirements established by these statutes.

38. The Court should therefore deny the Motion and direct the Debtors to cease all salary payments to Uribe for the duration of the Bankruptcy Cases.

CONCLUSION

For the reasons stated above, the Debtors have failed to establish the propriety of the relief requested in the Motion, as they have not satisfied their burdens under either §§ 503(c) or 363(c) of the Bankruptcy Code. This Court should therefore deny the Debtors' Emergency Motion for Allowance of Affiliate Officers' Salaries and Benefits, Effective as of the Petition Date solely in regard to Uribe and order the Debtors to cease further payments to her during the course of the Bankruptcy Cases.

Dated: Tampa, Florida
October 8, 2026

Respectfully submitted,

FOLEY & LARDNER LLP

By: */s/ Mark J. Wolfson*

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on October 8, 2026 a true and correct copy of the foregoing was electronically filed by CM/ECF, which caused notice to be sent to all those registered recipients.

/s/ Mark J. Wolfson
Mark J. Wolfson