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Co-Counsel to the Reorganized Debtor

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

In re **PECF USS INTERMEDIATE HOLDING II CORP.**[1] Reorganized Debtor.	Case No. 25-23631 (MBK) Chapter 11 (Jointly Administered)

REORGANIZED DEBTOR'S FIRST OMNIBUS OBJECTION TO CLAIMS

[1] The last four digits of Reorganized Debtor PECF USS Intermediate Holding II Corporation's tax identification number are 9019. PECF USS Intermediate Holding II Corporation's chapter 11 case was previously jointly administered under the case of United Site Services, Inc., Case No. 25-23630 (MBK). The location of PECF USS Intermediate Holding II Corporation's service address in this chapter 11 case is: 2487 W Navigator Drive, Ste. 300, Meridian, ID 83642.

25236312605140000000000003

TO THE HONORABLE MICHAEL B. KAPLAN, UNITED STATES BANKRUPTCY JUDGE:

The above-captioned reorganized debtor (the "**Reorganized Debtor**" and, together with its affiliated former debtors and their successors, as applicable, the "**Reorganized Debtors**" or "**USS**") respectfully state as follows in support of this first omnibus objection (the "**First Omnibus Objection**").

You should locate your claim on Schedule 1 attached to the Proposed Order. Please take notice that this First Omnibus Objection seeks to disallow in full, for purposes of the Chapter 11 Cases, all claims set forth on Schedule 1. Therefore, please read this notice very carefully and discuss it with your attorney. If you do not have an attorney, you may wish to consult one.

RELIEF REQUESTED

1. The Reorganized Debtor seeks entry of an order, substantially in the form attached hereto as **Exhibit A** (the "**Proposed Order**"), disallowing in full each of the claims listed on **Schedule 1** to the Proposed Order (the "**No Bankruptcy Liability Claims**") while reserving all claimants' rights to pursue the No Bankruptcy Liability Claims outside of the Chapter 11 Cases. In support of this First Omnibus Objection, the Reorganized Debtor submits the *Declaration of Holden Bixler in Support of the Reorganized Debtor's First Omnibus Objection to Claims* attached hereto as **Exhibit B** (the "**Bixler Declaration**").

2. The principal statutory bases for the relief requested in this First Omnibus Objection are section 502 of title 11 of the U.S. Code (the "**Bankruptcy Code**"), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), Rules 3007-1 and 3007-2 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the "**Local Rules**"), and section VIII(b) of the Chapter 11 Complex Case Procedures (Dec. 2, 2025) (the "**Complex Case Procedures**").

JURISDICTION AND VENUE

3. The Court has jurisdiction over this First Omnibus Objection pursuant to 28 U.S.C. § 1334. This case has been referred to the Court pursuant to 28 U.S.C. § 157(a) by the *Standing Order of Reference to the Bankruptcy Court under Title 11* (D.N.J. amended June 6, 2025)

(Bumb, C.J.). This First Omnibus Objection is a core proceeding under 28 U.S.C. § 157(b). The Reorganized Debtor consents to the Court's entry of a final order on this First Omnibus Objection if it is determined that the Court cannot otherwise enter a final order or judgment consistent with Article III of the U.S. Constitution. Venue in the Court is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

4. On December 29, 2025 (the "**Petition Date**"), each Debtor commenced a case under chapter 11 of the Bankruptcy Code (collectively, the "**Chapter 11 Cases**") by filing a voluntary petition for relief. These were prepackaged cases commenced for the purpose of implementing a comprehensive restructuring in accordance with the terms of a restructuring support agreement. The Debtors commenced solicitation of votes on the *Joint Prepackaged Plan of Reorganization of United Site Services, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Dkt. No. 16] (as subsequently amended, modified, supplemented, and confirmed, the "**Plan**") reflecting the terms of the restructuring support agreement prior to commencing these Chapter 11 Cases, and filed that Plan of Reorganization on the Petition Date.

5. On February 27, 2026, the Court entered the *Order (I) Approving the Adequacy of the Disclosure Statement and (II) Confirming the Second Amended Joint Prepackaged Plan of Reorganization of United Site Services, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Dkt. No. 344].

6. On March 3, 2026, the Effective Date (as defined in the Plan) occurred. *See Notice of (I) Entry of an Order Approving the Adequacy of the Disclosure Statement and Confirming the Second Amended Joint Prepackaged Plan of Reorganization of United Site Services, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code and (II) Occurrence of Effective Date* [Dkt. No. 384].

7. On April 16, 2026, the Court entered the *Final Decree Closing Certain of the Chapter 11 Cases* [Dkt. No. 454], closing the Chapter 11 Cases of the Reorganized Debtors, other than Reorganized Debtor PECF USS Intermediate Holding II Corporation. All remaining matters,

including claims reconciliation with respect to claims against any Reorganized Debtor, are to be administered in the case of Reorganized Debtor PECF USS Intermediate Holding II Corporation.

8. For further information about USS, its business operations, assets and capital structure, and the circumstances that led to the filing of the Chapter 11 Cases, USS refers to the *Declaration of Chris Kelly in Support of Chapter 11 Petitions and First Day Motions of United Site Services, Inc. et al.* [Dkt. No. 15], filed on December 29, 2025.

9. Under the Plan, "in light of the Unimpaired status of all Allowed General Unsecured Claims under the Plan and as otherwise required by the Plan, Holders of Claims need not file proofs of Claim," and "there is no requirement to file a proof of Claim (or move the Court for allowance) to be an Allowed Claim, as applicable under the Plan." Plan, Art. VII.A. Thus, no bar date was established in these Chapter 11 Cases. The only parties required to file proofs of Claim were counterparties to a rejected Executory Contract or Unexpired Lease for damages resulting from such rejection within thirty days following entry of an order (including the Confirmation Order) approving such rejection. *Id.*, Art. VII.C. The Debtors were not required to file schedules of assets and liabilities or statements of financial affairs. *See* Scheduling Order ¶ 19 [Dkt. No. 80].

10. Furthermore, except for Claims that are subject to limitations under sections 502 and 503 of the Bankruptcy Code, the Plan provides that, "the Reorganized Debtors and the Holders of Claims shall determine, adjudicate, and resolve any disputes over the validity and amounts of such Claims in the ordinary course of business as if the Chapter 11 Cases had not been commenced." Plan, Art. VII.A.

11. Since the Effective Date, the Reorganized Debtors and their advisors have reviewed the filed proofs of Claim to determine which Claims have been satisfied, which should be administered under the Plan, and which should be determined, adjudicated or otherwise resolved outside the chapter 11 process. The Reorganized Debtor previously filed two omnibus notices to inform claimants that 86 Claims have been satisfied or were otherwise duplicative. This First Omnibus Objection now seeks to disallow, solely for purposes of the Chapter 11 Cases, those Claims that are contemplated to be administered outside of the Chapter 11 Cases. In each case, the

Reorganized Debtors intend that both the Reorganized Debtors and the respective claimants shall retain all rights and defenses (including jurisdictional, procedural, time-based, and merits-based defenses) with respect to the Claims that are subject to this First Omnibus Objection.

BASIS FOR RELIEF

12. Section 502(a) of the Bankruptcy Code provides, in pertinent part, that: "[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest . . . objects." 11 U.S.C. § 502(a). When asserting a proof of claim against a debtor's estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the claimant. *See In re Allegheny Int'l, Inc.*, 954 F.2d 167, 173 (3d Cir. 1992). To receive the benefit of *prima facie* validity, however, the proof of claim must "set[] forth facts necessary to support the claim." *In re Stoecker*, 143 B.R. 879, 883 (N.D. Ill. 1992). Where the claimant alleges sufficient facts to support its claim, the claim is afforded *prima facie* validity. *Allegheny*, 954 F.2d at 173.

13. But if an objection is filed, the court, upon notice and a hearing, must determine the validity and the proper amount of the claim. *See* 11 U.S.C. § 502(b). Thus, while a properly-filed proof of claim is *prima facie* evidence of the claim's allowed amount, when an objecting party presents evidence to rebut a claim's prima facie validity, the claimant bears the burden of proving the claim's validity by a preponderance of evidence. *See Allegheny*, 954 F.2d at 173–74. The burden of persuasion with respect to the claim is always on the claimant. *Id.* at 174; *Biolite, AG v. Cyganowski (In re Biolitec, Inc.)*, No. 13-5864 (FSH), 2013 WL 6795400, at *3 (D.N.J. Dec. 16, 2013). In other words, once the *prima facie* validity of a claim is rebutted, "it is for the claimant to prove his claim, not for the objector to disprove it." *In re Kahn*, 114 B.R. 40, 44 (Bankr. S.D.N.Y. 1990) (citations omitted).

14. Bankruptcy Rule 3007(d) provides certain specific grounds upon which "objections to more than one claim may be joined in a single objection." Fed. R. Bankr. P. 3007(d). In addition to the grounds specified by Bankruptcy Rule 3007(d), section VIII(b) of the Complex Case

Procedures permits parties to file omnibus objections to no more than 250 claims at a time on the following or similar grounds:

> (i) the amount claimed contradicts the debtor's books and records; (ii) the claims were incorrectly or improperly classified; (iii) the claims seek recovery of amounts for which the debtors are not liable; (iv) the claims do not include sufficient documentation to ascertain the validity of the claims or the claims fail to sufficiently specify the basis for the claims; (v) the Claims are filed against non-debtors, the wrong debtor or are filed against multiple debtors, except to the extent permitted under any bar date order entered in the applicable case, (vi) the claims are disallowed under section 502 of the Bankruptcy Code and (vii) the claimant has withdrawn the claim formally pursuant to either a pleading or the entry of a Court order.

Complex Case Procedures § VIII(b)(ii).

15. The Reorganized Debtor seeks to disallow the No Bankruptcy Liability Claims solely for the purposes of the Chapter 11 Cases on the basis that the Plan does not make the Reorganized Debtors liable for payment of the No Bankruptcy Liability Claims through the chapter 11 process. This First Omnibus Objection is without prejudice to the Reorganized Debtors' right and obligation to pay any such Claim that is valid under non-bankruptcy law and without prejudice to any claimant's right to pursue any such Claim outside of the bankruptcy process. *See* Plan, Art. VII.A. Accordingly, the Reorganized Debtor respectfully requests that the Court disallow each of the No Bankruptcy Liability Claims set forth on **Schedule 1** to the Proposed Order, solely for purposes of bankruptcy claims administration.

RESERVATION OF RIGHTS

16. In the event that any of the claims included on **Schedule 1** are not disallowed on the grounds asserted herein, the Reorganized Debtors reserve their rights to object to such claims on any other grounds. Additionally, the Reorganized Debtors expressly reserve their rights to amend, modify, or supplement any of the objections asserted herein and to file additional objections to the claims included on **Schedule 1** on any basis.

17. Nothing contained herein or any actions taken pursuant to such relief is intended or should be construed as: (a) an admission as to the validity of any prepetition claim against a Reorganized Debtor entity or such Reorganized Debtor entity's estate; (b) a waiver of any party's

right to dispute any prepetition claim on any grounds, including jurisdictional, procedural, time-based, and merits-based grounds; (c) a promise or requirement to pay any prepetition claim; (d) an implication or admission that any particular claim is of a type specified or defined in this First Omnibus Objection or any order granting the relief requested by this First Omnibus Objection; (e) a request or authorization to assume any prepetition agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (f) a waiver of the Reorganized Debtors' rights under the Bankruptcy Code or any other applicable law.

SEPARATE CONTESTED MATTERS

18. Each objection to a No Bankruptcy Liability Claim through this First Omnibus Objection constitutes a separate contested matter under Bankruptcy Rule 9014. The Reorganized Debtor respectfully requests that any order entered by the Court with respect to an objection asserted in this First Omnibus Objection shall be deemed a separate order with respect to each such No Bankruptcy Liability Claim.

NOTICE

19. Notice of this First Omnibus Objection will be provided to persons listed in paragraph 94 of the Confirmation Order, including the holders of the No Bankruptcy Liability Claims. The Reorganized Debtor respectfully submits that no further notice is required.

[Remainder of page intentionally blank]

Upon the foregoing First Omnibus Objection, the Reorganized Debtor respectfully requests that the Court (a) enter the proposed order, substantially in the form attached to the First Omnibus Objection as **Exhibit A**, granting the First Omnibus Objection, and (b) grant such other relief as is just and proper.

Dated: May 14, 2026

Respectfully submitted,

/s/ Michael D. Sirota

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Co-Counsel to the Reorganized Debtor

EXHIBIT A TO FIRST OMNIBUS OBJECTION

PROPOSED ORDER

UNITED STATES BANKRUPTCY COURT **DISTRICT OF NEW JERSEY**	
In re **PECF USS INTERMEDIATE HOLDING II CORP.**[1] Reorganized Debtor.	Case No. 25-23631 (MBK) Chapter 11 (Jointly Administered) **Related to Dkt. No. _____**

ORDER SUSTAINING
REORGANIZED DEBTOR'S FIRST OMNIBUS OBJECTION TO CLAIMS

The relief set forth on the following pages, numbered (3) through (4), is **ORDERED**.

[1] The last four digits of Reorganized Debtor PECF USS Intermediate Holding II Corporation's tax identification number are 9019. PECF USS Intermediate Holding II Corporation's chapter 11 case was previously jointly administered under the case of United Site Services, Inc., Case No. 25-23630 (MBK). The location of PECF USS Intermediate Holding II Corporation's service address in this chapter 11 case is: 2487 W Navigator Drive, Ste. 300, Meridian, ID 83642.

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

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Co-Counsel to the Reorganized Debtor

Upon the objection (the "**First Omnibus Objection**")[1] of the above-captioned reorganized debtor (the "**Reorganized Debtor**" and, together with its affiliated former debtors and their successors, as applicable, the "**Reorganized Debtors**") for entry of an order (this "**Order**") disallowing in full the claims listed on **Schedule 1** hereto (the "**No Bankruptcy Liability Claims**"), solely for purposes of bankruptcy claims administration; and the Court having jurisdiction to decide the First Omnibus Objection and to enter this Order pursuant to 28 U.S.C. § 1334; and the 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 First Omnibus Objection 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 First Omnibus Objection 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 First Omnibus Objection, the Bixler Declaration, and the record establish just cause for entry of this Order; it is hereby **ORDERED** that:

1. The First Omnibus Objection is **SUSTAINED** as set forth herein.

2. The No Bankruptcy Liability Claims listed on **Schedule 1** are hereby disallowed in full, solely for purposes of claims administration in the Chapter 11 Cases and without prejudice to any party's right to determine, adjudicate, and resolve any disputes over the validity and amounts of such Claims in the ordinary course of business as if the Chapter 11 Cases had not been commenced.

3. The rights of the Reorganized Debtors to contest any of the No Bankruptcy Liability Claims that are the subject of the First Omnibus Objection on any grounds and in any forum of

[1] Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the First Omnibus Objection.

competent jurisdiction, and to amend, modify, and/or supplement the First Omnibus Objection, including to object to amended or newly filed claims, is hereby expressly reserved.

4. For the avoidance of doubt, nothing in the First Omnibus Objection or this Order shall be deemed or construed to (a) constitute an admission as to the validity or priority of any claim against the Reorganized Debtors or their estates, (b) an implication or admission that any particular claim is of a type specified or defined in this Order or the First Omnibus Objection, or (c) constitute a waiver of the Reorganized Debtors' rights to dispute any claim on any grounds, including jurisdictional, procedural, time-based, and merits-based grounds.

5. The objection to each No Bankruptcy Liability Claim addressed in the First Omnibus Objection and as set forth on **Schedule 1** hereto constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each No Bankruptcy Liability Claim that is the subject of the First Omnibus Objection and this Order. Any stay of this Order pending appeal by any claimants whose No Bankruptcy Liability Claims are subject to this Order shall only apply to the contested matter that involves such claimant and shall not stay the applicability or finality of this Order with respect to any other contested matters addressed in the First Omnibus Objection and this Order.

6. Notice of the First Omnibus Objection as described therein is deemed good and sufficient notice of the First Omnibus Objection and the relief requested therein, and the requirements of Bankruptcy Rules and the Local Rules are satisfied by such notice.

7. Notwithstanding any provision of the Bankruptcy Rules or Local Rules, this Order shall be effective and enforceable immediately upon its entry.

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

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

SCHEDULE 1 TO PROPOSED ORDER

NO BANKRUPTCY LIABILITY CLAIMS

PECF USS Intermediate Holding II Corporation, Case No. 25-23631
First Omnibus Objection to Claims
Schedule 1 - No Bankruptcy Liability Claims

	NAME	DATE FILED	CASE #	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1	ARIZONA DEPARTMENT OF REVENUE C/O TAX, BANKRUPTCY AND COLLECTION SCT OFFICE OF THE ARIZONA ATTORNEY GENERAL - BCE 2005 N CENTRAL AVE, SUITE 100 PHOENIX, AZ 85004	02/05/2026	25-23633	Portable Holding, LLC	92	$250.00
2	ARIZONA DEPARTMENT OF REVENUE C/O TAX, BANKRUPTCY AND COLLECTION SCT OFFICE OF THE ARIZONA ATTORNEY GENERAL - BCE 2005 N CENTRAL AVE, SUITE 100 PHOENIX, AZ 85004	02/05/2026	25-23646	United Site Services of Nevada, Inc.	93	$13,000.00
3	ARIZONA DEPARTMENT OF REVENUE C/O TAX, BANKRUPTCY AND COLLECTION SCT OFFICE OF THE ARIZONA ATTORNEY GENERAL - BCE 2005 N CENTRAL AVE, SUITE 100 PHOENIX, AZ 85004	02/05/2026	25-23639	United Site Services Northeast, Inc.	94	$2,240.00
4	BEXAR COUNTY LINEBARGER GOGGAN BLAIR & SAMPSON, LLP 112 E. PECAN STREET, SUITE 2200 SAN ANTONIO, TX 78205	01/09/2026	25-23647	United Site Services of Texas, Inc.	9	$43,141.35

*Indicates claim contains unliquidated and/or undetermined amounts

PECF USS Intermediate Holding II Corporation, Case No. 25-23631
First Omnibus Objection to Claims
Schedule 1 - No Bankruptcy Liability Claims

	NAME	DATE FILED	CASE #	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
5	CALIFORNIA STATE CONTROLLER DAVID BROWNFIELD, STAFF COUNSEL 300 CAPITOL MALL, SUITE 1850 SACRAMENTO, CA 95814	02/24/2026	25-23630	United Site Services, Inc.	130	$7,313,093.66
6	CHARLES COUNTY, MARYLAND C/O MEYERS, RODBELL & ROSENBAUM, P.A. 6801 KENILWORTH AVENUE SUITE 400 RIVERDALE, MD 20737-1385	01/27/2026	25-23644	United Site Services of Maryland, Inc.	65	$39,707.46*
7	CITY OF FRESNO - BUSINESS TAX 2600 FRESNO STREET, ROOM 2031 FRESNO, CA 93721	02/12/2026	25-23630	United Site Services, Inc.	111	$636.59
8	CITY OF PROVIDENCE - TAX COLLECTOR CITY OF PROVIDENCE - LAW DEPARTMENT 444 WESTMINSTER STREET SUITE 220 PROVIDENCE, RI 02903	02/18/2026	25-23630	United Site Services, Inc.	114	$145,296.38
9	DEPARTMENT OF TREASURY - INTERNAL REVENUE SERVICE PO BOX 7346 PHILADELPHIA, PA 19101-7346	02/12/2026	25-23643	United Site Services of Louisiana, Inc.	107	$13,657.00

*Indicates claim contains unliquidated and/or undetermined amounts

PECF USS Intermediate Holding II Corporation, Case No. 25-23631
First Omnibus Objection to Claims
Schedule 1 - No Bankruptcy Liability Claims

	NAME	DATE FILED	CASE #	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
10	GEORGE L. MILLER, NOT INDIVIDUALLY, BUT AS CHAPTER 7 TRUSTEE OF KDC AGRIBUSINESS LLC, ET AL. KEVIN M. CAPUZZI, ESQ., AND JARED C. HOFFMAN, ESQ. BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP 1313 N. MARKET STREET SUITE 1201 WILMINGTON, DE 19801	01/29/2026	25-23629	Russell Reid Waste Hauling and Disposal Service Co., Inc.	72	$243,057.99
	Litigation Status: Miller v. Russell Reid Waste Hauling, No. 25-ap-50941-CTG (Bankr. D. Del.): Pending answer.					
11	HILLSBOROUGH COUNTY TAX COLLECTOR NANCY C. MILLAN TAX COLLECTOR PO BOX 30012 TAMPA, FL 33630-3012	02/03/2026	25-23630	United Site Services, Inc.	91	$31,588.43
12	JERRY L. NED II ADDRESS ON FILE	02/18/2026	25-23630	United Site Services, Inc.	115	$250,000.00
13	KEITH GILMORE, INDIVIDUALLY, AND ON BEHALF OF OTHER MEMBERS OF THE GENERAL PUBLIC SIMILARLY SITUATED, ET AL, PER CA PAGA LAWYERS FOR JUSTICE, PC 450 NORTH BRAND BLVD., #900 GLENDALE, CA 91203	02/19/2026	25-23640	United Site Services of California, Inc.	120	$1,462,500.00
	Litigation Status: Gilmore v. United Site Servs. of Cal., No. 24CV009938 (Cal. Super., Sacramento Cty.): Final settlement approval pending.					

*Indicates claim contains unliquidated and/or undetermined amounts

PECF USS Intermediate Holding II Corporation, Case No. 25-23631
First Omnibus Objection to Claims
Schedule 1 - No Bankruptcy Liability Claims

	NAME	DATE FILED	CASE #	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
14	LEE COUNTY TAX COLLECTOR MICHELE NUNES ATTN LEGAL SERVICES DEPARTMENT PO BOX 850 FORT MYERS, FL 33902	02/04/2026	25-23642	United Site Services of Florida, LLC	83	$9,706.74
15	LOUISIANA DEPARTMENT OF REVENUE PO BOX 66658 BATON ROUGE, LA 70896-6558	01/14/2026	25-23638	United Site National Services Company	17	$8,263.93
16	LOUISIANA DEPARTMENT OF REVENUE PO BOX 66658 BATON ROUGE, LA 70896-6558	01/14/2026	25-23630	United Site Services, Inc.	19	Undetermined*
17	MASSACHUSETTS DEPARTMENT OF REVENUE ATTN BANKRUPTCY UNIT PO BOX 7090 BOSTON, MA 02204-7090	12/31/2025	25-23639	United Site Services Northeast, Inc.	1	$17,288.26
18	MASSACHUSETTS DEPARTMENT OF REVENUE ATTN BANKRUPTCY UNIT PO BOX 7090 BOSTON, MA 02204-7090	12/31/2025	25-23646	United Site Services of Nevada, Inc.	2	$816.01

*Indicates claim contains unliquidated and/or undetermined amounts

PECF USS Intermediate Holding II Corporation, Case No. 25-23631
First Omnibus Objection to Claims
Schedule 1 - No Bankruptcy Liability Claims

	NAME	DATE FILED	CASE #	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
19	NEW JERSEY UNCLAIMED PROPERTY ADMINISTRATION PO BOX 214 TRENTON, NJ 08625	02/06/2026	25-23630	United Site Services, Inc.	95	$59,644.78
20	NEW YORK STATE DEPARTMENT OF LABOR 1220 WASHINGTON AVE BLDG 12-RM 256 ALBANY, NY 12226	01/21/2026	25-23639	United Site Services Northeast, Inc.	40	$1,104.86
21	NEW YORK STATE DEPARTMENT OF LABOR 1220 WASHINGTON AVE BLDG 12-RM 256 ALBANY, NY 12226	01/21/2026	25-23630	United Site Services, Inc.	47	$162.70
22	NEW YORK STATE DEPT. OF TAX AND FINANCE BANKRUPTCY SECTION PO BOX 5300 ALBANY, NY 12205	03/13/2026	25-23639	United Site Services Northeast, Inc.	141	$151.59
23	NM TAXATION & REVENUE DEPARTMENT COMPLIANCE BUREAU PO BOX 50129 ALBUERQUE, NM 87181-0129	03/24/2026	25-23630	United Site Services, Inc.	147	$391.53

*Indicates claim contains unliquidated and/or undetermined amounts

PECF USS Intermediate Holding II Corporation, Case No. 25-23631
First Omnibus Objection to Claims
Schedule 1 - No Bankruptcy Liability Claims

	NAME	DATE FILED	CASE #	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
24	NM TAXATION & REVENUE DEPARTMENT PO BOX 8575 ALBUQUERQUE, NM 87198-8575	02/02/2026	25-23629	Russell Reid Waste Hauling and Disposal Service Co., Inc.	70	$72,650.97
25	NM TAXATION & REVENUE DEPARTMENT PO BOX 8575 ALBUQUERQUE, NM 87198-8575	02/04/2026	25-23646	United Site Services of Nevada, Inc.	81	$1,886.65
26	OHIO DEPARTMENT OF JOB AND FAMILY SERVICES - OLAS OLAS 30 E. BROAD STREET, 31ST FLOOR COLUMBUS, OH 43215	01/15/2026	25-23630	United Site Services, Inc.	22	$1,633.45
27	OKLAHOMA TAX COMMISSION GENERAL COUNSELS OFFICE PO BOX 269056 OKLAHOMA CITY, OK 73126	01/20/2026	25-23646	United Site Services of Nevada, Inc.	38	$760.14
28	POLK COUNTY TAX COLLECTOR JOE G TEDDER, CGC POLK COUNTY TAX COLLECTOR PO BOX 2016 BARTOW, FL 33831	01/21/2026	25-23642	United Site Services of Florida, LLC	45	$1,319.37

*Indicates claim contains unliquidated and/or undetermined amounts

PECF USS Intermediate Holding II Corporation, Case No. 25-23631
First Omnibus Objection to Claims
Schedule 1 - No Bankruptcy Liability Claims

	NAME	DATE FILED	CASE #	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
29	PRINCE GEORGES COUNTY, MARYLAND C/O MEYERS, RODBELL & ROSENBAUM, P.A. 6801 KENILWORTH AVENUE SUITE 400 RIVERDALE, MD 20737-1385	01/27/2026	25-23644	United Site Services of Maryland, Inc.	64	$29,347.61*
30	RONY VARTANIAN NAZARYAN LAW, APC 21600 OXNARD ST, SUITE 1040 WOODLAND HILLS, CA 91367	02/04/2026	25-23630	United Site Services, Inc.	90	$750,000.00
31	SHARON TEXIDOR ADDRESS ON FILE	02/19/2026	25-23630	United Site Services, Inc.	117	$350,000.00
	Litigation Status: Texidor v. Dillard, No. 16-2025-CA-134 (Fla. Cir. Ct., 4th Cir.): Settled and dismissed.					
32	SHARON TEXIDOR ADDRESS ON FILE	02/19/2026	25-23642	United Site Services of Florida, LLC	118	$350,000.00
	Litigation Status: Texidor v. Dillard, No. 16-2025-CA-134 (Fla. Cir. Ct., 4th Cir.): Settled and dismissed.					
33	STATE OF NEVADA DEPARTMENT OF TAXATION 3850 ARROWHEAD DRIVE CARSON CITY, NV 89706	01/15/2026	25-23630	United Site Services, Inc.	25	$12,999.07

*Indicates claim contains unliquidated and/or undetermined amounts

PECF USS Intermediate Holding II Corporation, Case No. 25-23631
First Omnibus Objection to Claims
Schedule 1 - No Bankruptcy Liability Claims

	NAME	DATE FILED	CASE #	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
34	UNITED STATES OF AMERICA EX REL ELIZABETH KOEHLER, ET AL ROBERT J VALLI JR 600 OLD COUNTRY ROAD SUITE 519 GARDEN CITY, NY 11530 Litigation Status: U.S. ex rel. Koehler v. United Site Servs., Inc., No. 17-cv-7083 (E.D.N.Y.): Motion to dismiss granted; motion for reconsideration of order dismissing complaint pending. United States v. United Site Servs., Inc., No. 26-1139 (2d Cir.): Appeal of order dismissing complaint stayed pending resolution of motion for reconsideration in the district court.	03/03/2026	25-23630	United Site Services, Inc.	134	$59,773,087.97
35	UTAH STATE TAX COMMISSION ATTN BANKRUPTCY UNIT 210 N 1950 W SALT LAKE CITY, UT 84134-9000	01/12/2026	25-23630	United Site Services, Inc.	10	$2,076.29
36	UTAH STATE TAX COMMISSION ATTN BANKRUPTCY UNIT 210 N 1950 W SALT LAKE CITY, UT 84134-9000	01/12/2026	25-23646	United Site Services of Nevada, Inc.	12	$89.05
37	WILL ROBERTS - TAX COLLECTOR BANKRUPTCY CLERK 123 W. INDIANA AVE, RM 103 DELAND, FL 32720	02/25/2026	25-23630	United Site Services, Inc.	133	$4,671.32*
					TOTAL	$71,006,221.15*

*Indicates claim contains unliquidated and/or undetermined amounts

EXHIBIT B TO FIRST OMNIBUS OBJECTION

BIXLER DECLARATION

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

In re **PECF USS INTERMEDIATE HOLDING II CORP.**[1] Reorganized Debtor.	Case No. 25-23631 (MBK) Chapter 11 (Jointly Administered)

DECLARATION OF HOLDEN BIXLER IN SUPPORT OF REORGANIZED DEBTOR'S FIRST OMNIBUS OBJECTION TO CLAIMS

[1] The last four digits of Reorganized Debtor PECF USS Intermediate Holding II Corporation's tax identification number are 9019. PECF USS Intermediate Holding II Corporation's chapter 11 case was previously jointly administered under the case of United Site Services, Inc., Case No. 25-23630 (MBK). The location of PECF USS Intermediate Holding II Corporation's service address in this chapter 11 case is: 2487 W Navigator Drive, Ste. 300, Meridian, ID 83642.

Under 28 U.S.C. § 1746, I, Holden Bixler, declare as follows under penalty of perjury:

1. I am a Managing Director at Alvarez & Marsal North America, LLC ("A&M"). The Reorganized Debtors retained A&M and its subsidiaries, affiliates, agents, and independent contractors as restructuring advisors in connection with the Chapter 11 Cases.

2. As part of my current position, I am responsible for assisting the Reorganized Debtors with certain claims management and reconciliation matters. I am generally familiar with the Debtors' day-to-day operations, financing arrangements, business affairs, and books and records that reflect, among other things, the Debtors' liabilities and the amounts thereof owed to their creditors as of the Petition Date.

3. I submit this declaration in support of the *Reorganized Debtor's First Omnibus Objection* (the "**First Omnibus Objection**").[2] I am directly, or by and through the Reorganized Debtors' advisors and personnel, familiar with the contents of the First Omnibus Objection, including Schedule 1 attached to the Proposed Order.

4. Except as otherwise indicated, all facts set forth herein are based on my personal knowledge, my discussions with the members of the Reorganized Debtors' senior management, the Reorganized Debtors' advisors, and A&M personnel working directly with me and under my supervision, direction, or control, as well as my review of the relevant documents. My opinions are based upon my knowledge concerning the Reorganized Debtors' operations and financial affairs, as well as my general experience. If called upon to testify, I would testify competently to the facts set forth in this Declaration.

[2] Capitalized terms not otherwise defined herein have the meanings ascribed to them in the First Omnibus Objection.

NO BANKRUPTCY LIABILITY CLAIMS

5. Since the Effective Date, the Reorganized Debtors and their advisors, including A&M, have reviewed the filed proofs of Claim to determine which Claims have been satisfied, which should be administered under the Plan, and which should be determined, adjudicated or otherwise resolved outside the chapter 11 process. The First Omnibus Objection seeks to disallow, solely for purposes of the Chapter 11 Cases, those Claims that are contemplated to be administered outside the Chapter 11 Cases.

6. The Reorganized Debtor seeks to disallow the No Bankruptcy Liability Claims solely for the purposes of the Chapter 11 Cases on the basis that the Plan does not make the Reorganized Debtors liable for payment of the No Bankruptcy Liability Claims through the chapter 11 process. I understand that the First Omnibus Objection is without prejudice to the Reorganized Debtors' right and obligation to pay any such Claim that is valid under non-bankruptcy law, without prejudice to any claimant's right to pursue any such Claim outside of the bankruptcy process, and without prejudice to the Reorganized Debtors' right to defend against any such Claim on any grounds, including jurisdictional, procedural, time-based, and merits-based grounds.

7. Accordingly, I believe the No Bankruptcy Liability Claims should be disallowed in their entirety, solely for purposes of bankruptcy claims administration.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Dated: May 14, 2026

/s/ Holden Bixler

Holden Bixler
Managing Director, Alvarez & Marsal North America