

MANDELBAUM SALSBURG P.C.

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Counsel to the Debtors and
Debtors in Possession

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:

USI Services Group, Inc.

Ultimate Services Inc.

Strike Force Protective Services, Inc.

Strike Force of New Jersey, Inc.

Initial Protective Services Inc.

USI Landscape and Design, Inc.

Summit Staffing Solutions Inc.

Debtors.

Chapter 11

Case No. 18-10153 (JKS)

Case No. 18-10154 (JKS)

Case No. 18-10156 (JKS)

Case No. 18-10158 (JKS)

Case No. 18-10159 (JKS)

Case No. 18-10160 (JKS)

Case No. 18-10162 (JKS)

(Jointly Administered)

HEARING DATE: April 24, 2018

ORAL ARGUMENT – IF OPPOSITION
FILED

**NOTICE OF MOTION TO EXTEND TIME TO
EXCLUSIVITY**

TO: SERVICE LIST

PLEASE TAKE NOTICE that April 24, 2018 at 10:00 a.m., Mandelbaum Salsburg P.C., attorneys for the Debtors, shall move before the Honorable John K. Sherwood, U.S.B.J., at the United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey 07102 for an Order pursuant to 11 U. S. C. § 1121(d) extending the debtors' exclusive time to file a plan of reorganization.

A proposed form of order is also submitted with the moving papers.

PLEASE TAKE FURTHER NOTICE that Debtors requests oral argument only if opposition is filed.

DATED: April 3, 2018.

MANDELBAUM SALSBURG P.C.

/s/ Stuart Gold

By: _____
Stuart Gold

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USI Landscape and Design, Inc.	Case No. 18-10160 (JKS)
Summit Staffing Solutions Inc.	Case No. 18-10162 (JKS) (Jointly Administered)
Debtors.	HEARING DATE: April 24, 2018 ORAL ARGUMENT – IF OPPOSITION FILED

**MOTION OF DEBTOR FOR TO EXTEND EXCLUSIVE
TIME TO FILE PLAN OF REORGANIZATION**

The debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors”) by and through their attorneys, hereby move to extend their time to be the exclusive plan proponent pursuant to 11 U.S.C. § 1121(d)(4) and state as follows:

1. On January 3, 2018, the Debtors filed their voluntary petitions for relief under Chapter 11 of the Bankruptcy Code.

2. The Debtors are New Jersey corporations and are operating their businesses and managing their financial affairs as Debtors-in-Possession. No trustee, examiner or committee of unsecured creditors has been appointed to serve in this reorganization case.

3. The Debtors provide janitorial, security, landscaping and snow removal. The Debtors currently employ approximately 2,200 people while operating their business in the normal course.

4. Pursuant to 11 U.S.C. § 1121(c), the Debtors' time to be the exclusive plan proponent expires on May 3, 2018, which is 120 days from the Petition Date. The Debtors are requesting an additional 90 days, to August 1, 2018 of exclusivity.

5. The Debtors' plan is to sell their businesses as a going concern. Last week, the Debtors received four bids. It is in the process of evaluating the bids and will be submitting an application to approve the bidding procedures and a sale within the next week. We expect that the sale will be approved in May and the transaction closed in June 2018. The Debtors will not be in a position to file a plan until the sale is completed. Thus, the Debtors are requesting an additional 90 days of exclusivity.

WHEREFORE, the Debtors respectfully request that this Court enter an Order pursuant to 11 U.S.C. § 1121(d)(4) extending their time to be the exclusive plan proponent to and including August 1, 2018, and for such other and granting such other further relief as is just and proper.

DATED: April 3, 2018

MANDELBAUM SALSBURG P.C.

/s/ Stuart Gold

By: _____
Stuart Gold

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Debtors.	(Joint Administration Requested)

**ORDER EXTENDING DEBTORS' EXCLUSIVE TIME TO FILE
A PLAN OF REORGANIZATION**

The relief set forth on the following pages, numbered two (2) through two (2), is hereby

ORDERED.

Page 2 of 2

Debtors: USI Services Group, Inc., et al.

Case No.: 18- 10153 (JKS)

Caption: Order Extending Debtors' Exclusive Time to File a Plan of Reorganization

The above captioned Debtors having moved this Court for an extension of time to be the exclusive plan proponent, and good cause appearing, it is hereby

ORDERED THAT the Debtors' time to be the exclusive plan proponent is hereby extended to and including August 1, 2018.

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

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Summit Staffing Solutions, Inc.	Case No. 18-10162 (JKS)
Debtors.	(Joint Administration Requested)

CERTIFICATE OF SERVICE

On this date I caused to be served by ECF and first class mail the accompanying Notice of Motion, Motion and Proposed Order upon the following.

Dated: April 3, 2018

MANDELBAUM SALSBURG P.C.

/s/ Stuart Gold

By: _____
Stuart Gold

SERVICE LIST

VIA ECF

United States Trustee
1 Newark Center
Newark, NJ 07102

Ward Benson
United States Dept. of Justice
Ben Franklin Station
PO Box 227
Washington, DC 20044

And all others filing notices of appearance

VIA REGULAR MAIL

ESM WORLDWIDE
36 South Adamsville Road
Bridgewater, NJ 08807

Progress Street Holdings LLC
51 Progress Street
Union, NJ 07083

State of New York
P.O. Box 1909
Albany, NY 12201-1909

Internal Revenue Service
P.O. Box 80110
Cincinnati, OH 45280-0010

PA Department of Revenue
535 Chestnut Street
Sunbury, PA 17801-2834

NJ Division of Revenue
P.O. Box 1008 Moorestown,
NJ 08057-1008

Comptroller of Maryland
P.O. Box 2601
Annapolis, MD 21404-2601

MA Department of Revenue
P.O. Box 7025
Boston, MA 02204-7025

Chasan Leyner & Lamparello, P.C.
300 Harmon Meadow Blvd.
Secaucus, NJ 07094

Building Service 32 BJ Benefit Funds
25 West 18th Street
New York, NY 10011-4676

Goldman Antonetti & Cordova, PSC
American International Plaza, Ste 1500
San Juan PR 00918

Roach Bernard, PLLC
175 North Central Avenue
Valley Stream, NY 11580

Kuharski Levits et al (in re Alexis Griffith)
176 Hart Blvd.
Staten Island, NY 10301

Berkshire Hathaway Homestate Companies
P.O. Box 844501
Los Angeles, CA 90084-4501

VA Department of Taxation
P.O. Box 27264
Richmond, VA 23261-7264

CFSE
P.O. Box 42006
San Juan PR 00940-2006

Puerto Rico Department of Treasury
30 Recinto Sur St.
San Juan, PR 00936-0000

Liberty Mutual Insurance Company
P.O. Box 2027
Keene, NH 03431-2027

John A Morrissey, Esq Trust Account

261 Main St.
Charlestown, MA 02129

Michael Percario
1514 East St. Georges Avenue
Linden, NJ 07036

Arturo Martinez
4385 Monroe Avenue
Riverside, CA 92504

Koss & Schonfeld LLP
90 John St. Ste. 502
New York, NY 10038

First Mercury
26600 Telegraph Rd.
Southfield, MI 48033

CT Department of Revenue Services
P.O. Box 2931
Hartford, CT 06104-2931

State of Alabama Department of Revenue
649 Monroe St.
Montgomery, AL 36131
Attn: Barbara Knight

XL - Insurance T/A Indian Harbor Insurance
1236 Brace Rd. Ste K
Cherry Hill, NJ 08034

Law Offices of Nancy K. Galassi
1325 Franklin Ave. Ste. 120
Garden City, NY 11530

Xtreme Snow Pros
61 E. Ramapo Aven
Mahwah, NJ 07430

Transglobal Adjusting Corp
2857 Riviera Drive
Fairlawn OH 44333

State Comptroller
306 Harmony Hill Drive, Ste. A
Lufkin, TX 75901

Idaho Department of Labor
317 W. Main St.
Boise, ID 83735-0610

Subin Associates (in re Iannico)
150 Broadway, 23rd Floor
New York, NY 10038

State of Washington Department of Revenue
PO Box 47473 Olympia,
WA 98504

D'Amato & Lynch
Two World Financial Center
225 Liberty St
New York, NY 10281

(Internal Revenue Service
20 Washington Place
Newark, New Jersey 07102

New Jersey Division of Taxation Compliance and Enforcement – Bankruptcy Unit,
50 Barrack Street. 9th Floor
Trenton, NJ 08695

Office of the Attorney General of the State of New Jersey,
Division of Law
Richard J. Hughes Justice Complex
25 Market Street, Trenton, NJ 08625