

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

RELIZ TECHNOLOGY GROUP HOLDINGS  
INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 26-10371 (TMH)

(Jointly Administered)

RELIZ TECHNOLOGY GROUP HOLDINGS  
INC., *et al.*,

Plaintiffs,

v.

1548199 ALBERTA LTD. and ROBERT J.  
BERTRAM,

Defendants.

Adv. Pro. No. 26-50224 (TMH)

**NOTICE OF *SECOND AMENDED*<sup>2</sup> AGENDA FOR MATTERS SCHEDULED FOR  
HEARING ON APRIL 16, 2026 AT 2:00 P.M. (ET), BEFORE THE HONORABLE  
THOMAS M. HORAN IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE, 3RD FLOOR (COURTROOM NO. 7)**

This proceeding will be conducted in-person. All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom. Please refer to [Judge Horan's Chambers Procedures](#) and the [Court's website](#) for information on who may participate remotely, the method of allowed participation (video or audio), Judge Horan's expectations of remote participants, and the advance registration requirements.

**Registration is required by 4:00 p.m. (Eastern Time) the business day before the hearing unless otherwise noticed using the [eCourt Appearances](#) tool available on the Court's website.**

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of their respective federal tax identification numbers, are: Reliz Technology Group Holdings Inc. (6265); Reliz Technologies LLC (1968); Reliz LTD (N/A); and Reliz CI LTD (N/A). The Debtors' service address is 401 West Ontario St., Suite 400, Chicago, IL 60654.

<sup>2</sup> Amended items appear in bold.



**RESOLVED MATTERS**

1. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, (B) Continue to Pay Certain Brokerage Fees, (C) Extend, Renew, Replace, Supplement, or Modify Insurance Coverage, (II) Authorizing Banks to Honor Related Checks and Transfers, and (III) Granting Related Relief [Filed 3/16/26; [Docket No. 9](#)]

Related Documents:

- (a) Certification of Counsel Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, (B) Continue to Pay Certain Brokerage Fees, (C) Extend, Renew, Replace, Supplement, or Modify Insurance Coverage, (II) Authorizing Banks to Honor Related Checks and Transfers, and (III) Granting Related Relief [Filed 3/18/26; [Docket No. 53](#)]
- (b) Interim Order (I) Authorizing the Debtors to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, (B) Continue to Pay Certain Brokerage Fees, (C) Extend, Renew, Replace, Supplement, or Modify Insurance Coverage, (II) Authorizing Banks to Honor Related Checks and Transfers, and (III) Granting Related Relief [Entered 3/18/26; [Docket No. 60](#)]
- (c) Notice of Entry of Interim Order and Final Hearing with Respect to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, (B) Continue to Pay Certain Brokerage Fees, (C) Extend, Renew, Replace, Supplement, or Modify Insurance Coverage, (II) Authorizing Banks to Honor Related Checks and Transfers, and (III) Granting Related Relief [Filed 3/18/26; [Docket No. 66](#)]
- (d) Certification of Counsel Regarding Revised Proposed Final Order (I) Authorizing the Debtors To (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, (B) Continue to Pay Certain Brokerage Fees, (C) Extend, Renew, Replace, Supplement, or Modify Insurance Coverage, (II) Authorizing Banks to Honor Related Checks and Transfers, and (III) Granting Related Relief [Filed 4/13/26; [Docket No. 152](#)]
- (e) Final Order (I) Authorizing the Debtors To (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, (B) Continue to Pay Certain Brokerage Fees, (C) Extend, Renew, Replace, Supplement, or Modify Insurance Coverage, (II) Authorizing Banks to Honor Related Checks and Transfers, and (III) Granting Related Relief [Entered 4/13/26; [Docket No. 156](#)]

Response(s) Received:

- (a) Informal response received from the Official Committee of Unsecured Creditors (the "Committee")

Objection Deadline: April 3, 2026 at 4:00 p.m. (ET); extended to April 10, 2026 at 4:00 p.m. (ET) for the Committee

Status: The Court has entered an order granting the motion on a final basis; therefore, no hearing is necessary.

- 2. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Taxes and Fees, and (II) Granting Related Relief [Filed 3/16/26; [Docket No. 13](#)]

Related Documents:

- (a) Certification of Counsel Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Taxes and Fees, and (II) Granting Related Relief [Filed 3/18/26; [Docket No. 54](#)]
- (b) Interim Order (I) Authorizing the Debtors to Pay Certain Prepetition Taxes and Fees, and (II) Granting Related Relief [Entered 3/18/26; [Docket No. 64](#)]
- (c) Notice of Entry of Interim Order and Final Hearing with Respect to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Taxes and Fees, and (II) Granting Related Relief [Filed 3/18/26; [Docket No. 67](#)]
- (d) Certification of Counsel Regarding Revised Proposed Final Order (I) Authorizing the Debtors to Pay Certain Prepetition Taxes and Fees, and (II) Granting Related Relief [Filed 4/13/26; [Docket No. 154](#)]
- (e) Final Order (I) Authorizing the Debtors to Pay Certain Prepetition Taxes and Fees, and (II) Granting Related Relief [Entered 4/13/26; [Docket No. 157](#)]

Response(s) Received:

- (a) Informal response received from the Committee

Objection Deadline: April 3, 2026 at 4:00 p.m. (ET); extended to April 10, 2026 at 4:00 p.m. (ET) for the Committee

Status: The Court has entered an order granting the motion on a final basis; therefore, no hearing is necessary.

3. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Pay Prepetition Wages and (B) Pay Expenses Arising under Employee Benefits Programs and Pay Related Administrative Obligations, (II) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Obligations, and (III) Granting Related Relief [Filed 3/16/26; [Docket No. 14](#)]

Related Documents:

- (a) Certification of Counsel Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Pay Prepetition Wages and (B) Pay Expenses Arising under Employee Benefits Programs and Pay Related Administrative Obligations, (II) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Obligations, and (III) Granting Related Relief [Filed 3/18/26; [Docket No. 55](#)]
- (b) Interim Order (I) Authorizing Debtors to (A) Pay Prepetition Wages and (B) Pay Expenses Arising under Employee Benefits Programs and Pay Related Administrative Obligations, (II) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Obligations, and (III) Granting Related Relief [Entered 3/18/26; [Docket No. 61](#)]
- (c) Notice of Entry of Interim Order and Final Hearing with Respect to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Pay Prepetition Wages and (B) Pay Expenses Arising Under Employee Benefits Programs and Pay Related Administrative Obligations, (II) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Obligations, and (III) Granting Related Relief [Filed 3/18/26; [Docket No. 68](#)]
- (d) Certification of Counsel Regarding Revised Proposed Final Order (I) Authorizing Debtors to (A) Pay Prepetition Wages and (B) Pay Expenses Arising Under Employee Benefits Programs and Pay Related Administrative Obligations, (II) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Obligations, and (III) Granting Related Relief [Filed 4/13/26; [Docket No. 155](#)]
- (e) Final Order (I) Authorizing Debtors to (A) Pay Prepetition Wages and (B) Pay Expenses Arising Under Employee Benefits Programs and Pay Related Administrative Obligations, (II) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Obligations, and (III) Granting Related Relief [Entered 4/13/26; [Docket No. 158](#)]

Response(s) Received:

- (a) Informal response received from the Committee

Objection Deadline: April 3, 2026 at 4:00 p.m. (ET); extended to April 10, 2026 at 4:00 p.m. (ET) for the Committee

Status: The Court has entered an order granting the motion on a final basis; therefore, no hearing is necessary.

**MATTERS FILED UNDER CERTIFICATION**

4. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System and (B) Maintain Existing Bank Accounts and Business Forms and Honor Certain Prepetition Obligations Related Thereto; (II) Authorizing the Debtors to (A) Continue to Perform Intercompany Transactions and (B) Granting Administrative Expense Status for Postpetition Intercompany Claims; (III) Extending the Time for the Debtors to Comply with Requirements Set Forth in 11 U.S.C. § 345(b); and (IV) Granting Related Relief [Filed 3/16/26; [Docket No. 10](#)]

Related Documents:

- (a) Certification of Counsel Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System and (B) Maintain Existing Bank Accounts and Business Forms and Honor Certain Prepetition Obligations Related Thereto; (II) Authorizing the Debtors to (A) Continue to Perform Intercompany Transactions and (B) Granting Administrative Expense Status for Postpetition Intercompany Claims; (III) Extending the Time for the Debtors to Comply with Requirements Set Forth in 11 U.S.C. § 345(b); and (IV) Granting Related Relief [Filed 3/19/26; [Docket No. 73](#)]
- (b) Interim Order (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System and (B) Maintain Existing Bank Accounts and Business Forms and Honor Certain Prepetition Obligations Related Thereto; (II) Authorizing the Debtors to (A) Continue to Perform Intercompany Transactions and (B) Granting Administrative Expense Status for Postpetition Intercompany Claims; (III) Extending the Time for the Debtors to Comply with Requirements Set Forth in 11 U.S.C. § 345(b); and (IV) Granting Related Relief [Entered 3/19/26; [Docket No. 75](#)]
- (c) Notice of Entry of Interim Order and Final Hearing with Respect to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System and (B) Maintain Existing Bank Accounts and Business Forms and Honor Certain Prepetition Obligations Related Thereto; (II) Authorizing the Debtors to (A) Continue to Perform Intercompany Transactions and (B) Granting Administrative Expense Status for Postpetition Intercompany Claims; (III) Extending the Time for the Debtors to Comply with Requirements Set Forth in 11 U.S.C. § 345(b); and (IV) Granting Related Relief [Filed 3/19/26; [Docket No. 76](#)]
- (d) Notice of Filing of Amended Bank Account Schedule [Filed 3/30/26; [Docket No. 113](#)]

- (e) Certification of Counsel Regarding Revised Proposed Final Order (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System and (B) Maintain Existing Bank Accounts and Business Forms and Honor Certain Prepetition Obligations Related Thereto; (II) Authorizing the Debtors to (A) Continue to Perform Intercompany Transactions and (B) Granting Administrative Expense Status for Postpetition Intercompany Claims; (III) Extending the Time for the Debtors to Comply with Requirements Set Forth in 11 U.S.C. § 345(b); and (IV) Granting Related Relief [Filed 4/14/26; [Docket No. 165](#)]
- (f) Final Order (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System and (B) Maintain Existing Bank Accounts and Business Forms and Honor Certain Prepetition Obligations Related Thereto; (II) Authorizing the Debtors to (A) Continue to Perform Intercompany Transactions and (B) Granting Administrative Expense Status for Postpetition Intercompany Claims; (III) Extending the Time for the Debtors to Comply with Requirements Set Forth in 11 U.S.C. § 345(b); and (IV) Granting Related Relief [Entered 4/14/26; [Docket No. 175](#)]

Response(s) Received:

- (a) Informal response received from the Committee

Objection Deadline: April 3, 2026 at 4:00 p.m. (ET); extended to April 13, 2026 at 11:59 p.m. (ET) for Celsius Network Limited (“Celsius”) and the Committee

Status: The Court has entered an order granting the motion on a final basis; therefore, no hearing is necessary.

- 5. Motion of Debtors for Entry of Order (I) Establishing Bar Dates to File Proofs of Claim; (II) Approving Procedures for Filing Proofs of Claim; (III) Approving Form and Manner of Notice of Bar Dates; and (IV) Granting Related Relief [Filed 3/25/26; [Docket No. 93](#)]

Related Documents:

- (a) Certification of Counsel Regarding Motion of Debtors for Entry of Order (I) Establishing Bar Dates to File Proofs of Claim; (II) Approving Procedures for Filing Proofs of Claim; (III) Approving Form and Manner of Notice of Bar Dates; and (IV) Granting Related Relief [Filed 4/14/26; [Docket No. 167](#)]
- (b) Order (I) Establishing Bar Dates to File Proofs of Claim; (II) Approving Procedures for Filing Proofs of Claim; (III) Approving Form and Manner of Notice of Bar Dates; and (IV) Granting Related Relief [Entered 4/14/26; [Docket No. 176](#)]

Response(s) Received:

- (a) Informal response received from the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”)
- (b) Informal response received from the Committee

Objection Deadline: April 8, 2026 at 4:00 p.m. (ET); extended to (i) April 10, 2026 at 4:00 p.m. (ET) for the U.S. Trustee and (ii) April 13, 2026 at 11:59 p.m. (ET) for Celsius and the Committee

Status: The Court has entered an order granting the motion; therefore, no hearing is necessary.

6. Motion to Authorize the Employment and Payment of Professionals Used in the Ordinary Course of Business [Filed 3/26/26; [Docket No. 100](#)]

Related Documents:

- (a) Certification of Counsel Regarding Motion of Debtors for Entry of Order Authorizing the Employment and Payment of Professionals Used in the Ordinary Course of Business [Filed 4/13/26; [Docket No. 159](#)]
- (b) Order Authorizing the Employment and Payment of Professionals Used in the Ordinary Course of Business [Entered 4/14/26; [Docket No. 174](#)]

Response(s) Received:

- (a) Informal response received from the Committee

Objection Deadline: April 9, 2026 at 4:00 p.m. (ET); extended to April 10, 2026 at 4:00 p.m. (ET) for the Committee

Status: The Court has entered an order granting the motion; therefore, no hearing is necessary.

7. Motion of Debtors for Entry of an Order (I) Approving Bidding Procedures for the Sale of Substantially All of the Debtors’ Assets, (II) Scheduling an Auction and Approving the Form and Manner of Notice Thereof, (III) Approving Assumption and Assignment Procedures, (IV) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof, and (V) Granting Related Relief [Filed 3/26/26; [Docket No. 101](#)]

Related Documents: None.

- (a) Certification of Counsel Regarding Motion of Debtors for Entry of an Order (I) Approving Bidding Procedures for the Sale of Substantially All of the Debtors

Assets, (II) Scheduling an Auction and Approving the Form and Manner of Notice Thereof, (III) Approving Assumption and Assignment Procedures, (IV) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof, and (V) Granting Related Relief [Filed 4/14/26; [Docket No. 168](#)]

- (b) Order (I) Approving Bidding Procedures for the Sale of Substantially All of the Debtors Assets, (II) Scheduling an Auction and Approving the Form and Manner of Notice Thereof, (III) Approving Assumption and Assignment Procedures, (IV) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof, and (V) Granting Related Relief [Entered 4/14/26; [Docket No. 177](#)]

Response(s) Received:

- (a) Informal response received from the U.S. Trustee
- (b) Informal response received from the Committee
- (c) Informal response received from Celsius

Objection Deadline: April 9, 2026 at 4:00 p.m. (ET); extended to April 13, 2026 at 11:59 p.m. (ET) for Celsius and the Committee

Status: The Court has entered an order granting the motion; therefore, no hearing is necessary.

**MATTERS GOING FORWARD**

- 8. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Filed 3/16/26; [Docket No. 16](#)]

Related Documents:

- (a) Declaration of Mark Renzi in Support of Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Filed 3/16/26; [Docket No. 17](#)]
- (b) Certification of Counsel Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Filed 3/18/26; [Docket No. 56](#)]

- (c) Interim Order (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Entered 3/18/26; [Docket No. 62](#)]
- (d) Notice of Entry of Interim Order, Second Interim Hearing, and Final Hearing with Respect to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Filed 3/18/26; [Docket No. 70](#)]
- (e) Certification of Counsel Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Filed 3/29/26; [Docket No. 107](#)]
- (f) Debtors' Reply in Support of Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Filed 3/29/26; [Docket No. 108](#)]
- (g) Certification of Counsel Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Filed 3/30/26; [Docket No. 117](#)]
- (h) Certification of Counsel Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Filed 3/30/26; [Docket No. 118](#)]
- (i) Second Interim Order (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Entered 3/30/26; [Docket No. 119](#)]
- (j) Notice of Filing of Third Interim Cash Collateral Order [Filed 4/13/26; [Docket No. 161](#)]
- (k) Notice of Deposition of Mark Renzi [Filed 4/14/26; [Docket No. 189](#)]
- (l) Notice of Rule 30(b)(6) Deposition of Debtors [Filed 4/14/26; [Docket No. 191](#)]
- (m) Motion of Debtors for Entry of Order Pursuant to Local Rule 9006-1(d) Granting the Debtors Leave to File the Debtors' Reply to the Objections to the Cash Collateral Motion [Filed 4/15/26; [Docket No. 192](#)]

- (n) **Debtors' Omnibus Reply in Support of Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Filed 4/15/26; [Docket No. 202](#)]**
- (o) **Notice of Filing of Revised Proposed Third Interim Cash Collateral Order [Filed 4/16/26; [Docket No. 209](#)]**

Response(s) Received:

- (a) 1548199 Alberta Ltd.'s and Robert J. Bertram's Limited Objection to the Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Filed 3/27/26; [Docket No. 103](#)]
- (b) Richard E. Ward Revocable Trust's Joinder to 1548199 Alberta Ltd.'s and Robert J. Bertram's Limited Objection to the Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Filed 3/27/26; [Docket No. 105](#)]
- (c) Sealed Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Third Interim Order (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Filed 4/14/26; [Docket No. 164](#)]
- (d) 1548199 Alberta Ltd. and Robert J. Bertram's Limited Objection to the Third Interim Cash Collateral Order [Filed 4/14/26; [Docket No. 182](#)]
- (e) Notice of Filing Unsealed Copy of the Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Third Interim Order (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Filed 4/14/26; [Docket No. 183](#)]
- (f) Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Third Interim Order (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Filed 4/14/26; [Docket No. 185](#)]
- (g) Informal response received from Celsius

Witness and Exhibit List(s):

- (a) Debtors' Witness and Exhibit List for April 16, 2026 (2:30 p.m. ET) Hearing [Filed 4/13/26; [Docket No. 153](#)]
- (b) Claimants' Witness List and Exhibit List for the Hearing Scheduled for April 16, 2026 at 2:30 pm (ET) [Filed 4/14/26; [Docket No. 171](#)]
- (c) **Debtors' Amended Witness and Exhibit List for April 16, 2026 (2:00 p.m. ET) Hearing [Filed 4/16/26; [Docket No. 211](#)]**

Objection Deadline: April 3, 2026 at 4:00 p.m. (ET); extended to April 13, 2026 at 11:59 p.m. (ET) for Celsius and the Committee

Status: This matter is going forward.

- 9. Motion of 1548199 Alberta Ltd. and Robert J. Bertram for Relief from Stay Pursuant to 11 U.S.C. § 362 [Filed 3/23/26; [Docket No. 81](#)]

Related Documents:

- (a) Claimants' Reply Memorandum Supporting Their Motion for Relief from Stay [Filed 4/14/26; [Docket No. 188](#)]

Response(s) Received:

- (b) Objection of Debtors to Motion of 1548199 Alberta Ltd. and Robert J. Bertram for Relief from Stay Pursuant to 11 U.S.C. § 362 [Filed 4/9/26; [Docket No. 135](#)]
- (c) Joinder of Gordon Wallace in Support of Debtors' Objection to Motion of 1548199 Alberta Ltd. and Robert J. Bertram for Relief from Stay Pursuant to 11 U.S.C. § 362 [Filed 4/9/26; [Docket No. 136](#)]
- (d) Joinder of Joseph P. Perry in Support of Debtors' Objection to Motion of 1548199 Alberta Ltd. and Robert J. Bertram for Relief from Stay Pursuant to 11 U.S.C. § 362 [Filed 4/9/26; [Docket No. 137](#)]
- (e) Joinder and Reservation of Rights of the Official Committee of Unsecured Creditors to Objection of Debtors to Motion of 1548199 Alberta Ltd. and Robert J. Bertram for Relief from Stay Pursuant to 11 U.S.C. § 362 [Filed 4/10/26; [Docket No. 139](#)]
- (f) Joinder and Reservation of Rights of Nicholas Hammer to Objection of Debtors to Motion of 1548199 Alberta Ltd. and Robert J. Bertram for Relief from Stay Pursuant to 11 U.S.C. § 362 [Filed 4/10/26; [Docket No. 141](#)]

Witness and Exhibit List(s):

- (a) Debtors' Witness and Exhibit List for April 16, 2026 (2:30 p.m. ET) Hearing [Filed 4/13/26; [Docket No. 153](#)]
- (b) Claimants' Witness List and Exhibit List for the Hearing Scheduled for April 16, 2026 at 2:30 pm (ET) [Filed 4/14/26; [Docket No. 171](#)]
- (c) **Debtors' Amended Witness and Exhibit List for April 16, 2026 (2:00 p.m. ET) Hearing [Filed 4/16/26; [Docket No. 211](#)]**

Objection Deadline: April 9, 2026 at 4:00 p.m. (ET)

Status: This matter is going forward.

- 10. Motion of Debtors for Entry of Order Pursuant to Local Rule 9006-1(d) Granting the Debtors Leave to File the Debtors' Reply to the Objections to the Cash Collateral Motion [Filed 4/15/26; [Docket No. 192](#)]

Related Documents:

- (a) **Order Pursuant to Local Rule 9006-1(d) Granting the Debtors Leave to File the Debtors' Reply to the Objections to the Cash Collateral Motion [Entered 4/15/26; [Docket No. 198](#)]**
- (b) **Debtors' Omnibus Reply in Support of Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Filed 4/15/26; [Docket No. 202](#)]**

Response(s) Received: None.

Objection Deadline: At or prior to the hearing.

Status: **The Court has entered an order granting the motion; therefore, no hearing is necessary.**

**ADVERSARY MATTER GOING FORWARD**

- 11. Motion of Debtors for Entry of Temporary Restraining Order and Preliminary Injunction (I) Enjoining Continuation of Certain Prepetition Litigation Against Directors and Officers or (II) in the Alternative, Extending the Automatic Stay to Such Directors and Officers to Prevent Continued Prosecution of Prepetition Litigation Against Them [Filed 3/25/26; [Adv. Docket No. 3](#)]

Related Documents:

- (a) Verified Adversary Complaint for Temporary Restraining Order and Preliminary Injunction (I) Enjoining Continuation of Certain Prepetition Litigation Against Directors and Officers or (II) in the Alternative, Extending the Automatic Stay to Such Directors and Officers to Prevent Continued Prosecution of Prepetition Litigation Against Them [Filed 3/25/26; [Adv. Docket No. 1](#)]
- (b) Memorandum of Law in Support of Motion of Debtors for Entry of Temporary Restraining Order and Preliminary Injunction (I) Enjoining Continuation of Certain Prepetition Litigation Against Directors and Officers or (II) in the Alternative, Extending the Automatic Stay to Such Directors and Officers to Prevent Continued Prosecution of Prepetition Litigation Against Them [Filed 3/25/26; [Adv. Docket No. 4](#)]
- (c) Sealed Declaration of David Hurst in Support of the Motion of Debtors for Entry of Temporary Restraining Order and Preliminary Injunction (I) Enjoining Continuation of Certain Prepetition Litigation Against Directors and Officers or (II) in the Alternative, Extending the Automatic Stay to Such Directors and Officers to Prevent Continued Prosecution of Prepetition Litigation Against Them [Filed 3/25/26; Adv. Docket No. 5]
- (d) Redacted Declaration of David Hurst in Support of the Motion of Debtors for Entry of Temporary Restraining Order and Preliminary Injunction (I) Enjoining Continuation of Certain Prepetition Litigation Against Directors and Officers or (II) in the Alternative, Extending the Automatic Stay to Such Directors and Officers to Prevent Continued Prosecution of Prepetition Litigation Against Them [Filed 3/25/26; [Adv. Docket No. 6](#)]
- (e) Notice of Hearing on the Motion of Debtors for Entry of Temporary Restraining Order and Preliminary Injunction (I) Enjoining Continuation of Certain Prepetition Litigation Against Directors and Officers or (II) in the Alternative, Extending the Automatic Stay to Such Directors and Officers to Prevent Continued Prosecution of Prepetition Litigation Against Them [Filed 3/25/26; [Adv. Docket No. 7](#)]
- (f) Order Granting the Motion of Debtors for Entry of Temporary Restraining Order and Preliminary Injunction (I) Enjoining Continuation of Certain Prepetition Litigation Against Directors and Officers or (II) in the Alternative, Extending the Automatic Stay to Such Directors and Officers to Prevent Continued Prosecution of Prepetition Litigation Against Them [Entered: 3/26/26; [Adv. Docket No. 12](#)]
- (g) Debtors' Reply in Support of Motion of Debtors for Entry of Temporary Restraining Order and Preliminary Injunction (I) Enjoining Continuation of Certain Prepetition Litigation Against Directors and Officers or (II) In the Alternative, Extending the Automatic Stay to Such Directors and Officers to Prevent Continued

Prosecution of Prepetition Litigation Against Them [Filed: 4/13/26; [Adv. Docket No. 24](#)]

Response(s) Received:

- (a) Claimants' Response in Opposition to the Debtors' Motion for Entry of a Preliminary Injunction [Filed: 4/9/26; [Adv. Docket No. 22](#)]

Witness and Exhibit List(s):

- (a) Debtors' Witness and Exhibit List for April 16, 2026 (2:30 p.m. ET) Hearing [Filed 4/13/26; [Adv. Docket No. 23](#)]
- (b) Claimants' Witness List and Exhibit List for the Hearing Scheduled for April 16, 2026 at 2:30 pm (ET) [Filed 4/14/26; [Adv. Docket No. 26](#)]
- (c) **Debtors' Amended Witness and Exhibit List for April 16, 2026 (2:00 p.m. ET) Hearing [Filed 4/16/26; [Adv. Docket 28](#)]**

Objection Deadline: April 9, 2026 at 4:00 p.m. (ET)

Status: This matter is going forward.

*[Remainder of Page Intentionally Left Blank]*

Dated: April 16, 2026  
Wilmington, Delaware

**MCDERMOTT WILL & SCHULTE LLP**

/s/ David R. Hurst

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and Debtors in Possession*