

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: Reliz Technology Group Holdings Inc., Debtor. Tax I.D. No. 87-1036265	Chapter 11 Case No. 26-10371 (TMH)
In re: Reliz Technologies LLC, Debtor. Tax I.D. No. 83-3711968	Chapter 11 Case No. 26-10373 (TMH)
In re: Reliz CI LTD, Debtor. Tax I.D. No. N/A	Chapter 11 Case No. 26-10374 (TMH)
In re: Reliz LTD, Debtor. Tax I.D. No. N/A	Chapter 11 Case No. 26-10375 (TMH)

**MOTION OF DEBTORS FOR ENTRY OF AN ORDER
(I) DIRECTING JOINT ADMINISTRATION OF THE DEBTORS'
CHAPTER 11 CASES AND (II) GRANTING RELATED RELIEF**

Reliz Technology Group Holdings Inc. and its affiliated debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "Debtors") hereby move (the "Motion")



for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), granting the relief described below. In support thereof, the Debtors rely upon the *Declaration of Mark Renzi in Support of Chapter 11 Petitions and First Day Motions* [Docket No. 3] (the “First Day Declaration”).¹ In further support of the Motion, the Debtors respectfully represent as follows:

JURISDICTION AND VENUE

I. The Chapter 11 Cases

1. The Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012. This is a core proceeding under 28 U.S.C. § 157(b). Venue of these cases and the Motion in this District is proper under 28 U.S.C. §§ 1408 and 1409.

2. The legal predicates for the relief requested herein are sections 105(a) and 342(c)(1) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 1015-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”).

3. The Debtors confirm their consent, pursuant to Local Rule 9013-1(f) to the entry of a final order by the Court in connection with the Motion in the event that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

RELIEF REQUESTED

4. By the Motion, the Debtors respectfully request entry of the Proposed Order (a) directing procedural consolidation and joint administration of the above-captioned chapter 11

¹ Capitalized terms used but not otherwise defined in the Motion shall have the meanings ascribed to them in the First Day Declaration.

cases (collectively, the “Chapter 11 Cases”); and (b) granting related relief. Specifically, the Debtors request that one file and one docket be maintained for all of the jointly-administered Chapter 11 Cases under the case of Reliz Technology Group Holdings Inc., Case No. 26-10371 (TMH) and that the cases be administered under a consolidated caption as follows:

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

<p>In re:</p> <p>RELIZ TECHNOLOGY GROUP HOLDINGS INC., <i>et al.</i>,¹</p> <p style="text-align: right;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 26-10371 (TMH)</p> <p>(Jointly Administered)</p>
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¹ 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.

5. The Debtors further request that this Court order that the foregoing caption satisfies the requirements set forth in section 342(c)(1) of the Bankruptcy Code.

6. The Debtors also request that a docket entry, substantially similar to the following, be entered on the docket of each of the Debtor’s Chapter 11 Cases (other than the chapter 11 case of Reliz Technology Group Holdings Inc.) to reflect the joint administration of the Chapter 11 Cases:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure and Rule 1015-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware directing joint administration for procedural purposes only of the chapter 11 cases of: Reliz Technology Group Holdings Inc., Case No. 26-10371 (TMH); Reliz Technologies LLC, Case No. 26-10373 (TMH); Reliz CI LTD, Case No. 26-10374 (TMH); and Reliz LTD, Case No. 26-10375 (TMH). **All further pleadings and other papers shall be filed in and all further docket entries shall be made in Case No. 26-10371 (TMH).**

BACKGROUND

7. On March 15, 2026 (the “Petition Date”), each Debtor commenced a case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code (collectively, the “Chapter 11 Cases”) in the United States Bankruptcy Court for the District of Delaware (the “Court”).

8. The Debtors continue to operate their businesses and manage their properties as debtors and debtors in possession pursuant to Bankruptcy Code sections 1107(a) and 1108.

9. To date, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) has not appointed an official committee in the Chapter 11 Cases, nor has any trustee or examiner been appointed.

10. Additional information regarding the Debtors and the Chapter 11 Cases, including the reasons for and objectives of the Chapter 11 Cases, is set forth in the First Day Declaration.

BASIS FOR RELIEF REQUESTED

11. Bankruptcy Rule 1015(b) provides, in pertinent part, that “[t]he court may order joint administration of the estates . . . in two or more cases pending in the court if they are brought by or against . . . a debtor and an affiliate.” Fed. R. Bankr. P. 1015(b)(1)(D). The four Debtor entities that commenced the Chapter 11 Cases are “affiliates” as that term is defined in section 101(2) of the Bankruptcy Code, as Reliz Technologies LLC, Reliz CI LTD, and Reliz LTD are each direct or indirect subsidiaries of Reliz Technology Group Holdings Inc.

12. Further, Local Rule 1015-1 provides additional authority for the Court to order joint administration of the Chapter 11 Cases. *See* Del. Bankr. L.R. 1015-1 (providing that the Court may order joint administration of related cases pending in the Court without notice and an opportunity for hearing on a motion supported by an affidavit, declaration, or verification establishing that joint administration of the cases is warranted and will ease the administrative

burden for the Court and the parties). Accordingly, the Bankruptcy Rules, Bankruptcy Code, and Local Rules authorize the Court to grant the relief requested herein.

13. Given the integrated nature of the Debtors' operations, joint administration of the Chapter 11 Cases will provide significant administrative convenience without harming the substantive rights of any party in interest. Many, if not all, of the motions, hearings, and orders in the Chapter 11 Cases will affect each Debtor entity. The entry of an order directing joint administration of the Chapter 11 Cases will reduce fees and costs by avoiding duplicative filings, objections, or multiple hearings on common issues. Joint administration also will allow the U.S. Trustee and all parties in interest to monitor the Chapter 11 Cases with greater ease and efficiency.

14. Moreover, joint administration will not adversely affect the Debtors' respective constituencies because the Motion seeks only administrative, not substantive, consolidation of the Debtors' estates. Parties in interest will not be harmed by the relief requested; rather, parties in interest will benefit from the cost reductions associated with the joint administration of the Chapter 11 Cases. Accordingly, the Debtors submit that the joint administration of the Chapter 11 Cases is in the best interests of their estates, their creditors, and all other parties in interest.

NOTICE

15. The Debtors will provide notice of the Motion to: (a) the U.S. Trustee; (b) the Internal Revenue Service; (c) the Securities and Exchange Commission; (d) the Attorney General for the District of Delaware; (e) the parties included on the Debtors' list of their 30 largest unsecured creditors; and (f) all parties entitled to notice pursuant to Bankruptcy Rule 2002 and Local Rules 2002-1(b) and 9013-1(m). The Debtors submit that no other or further notice is required.

NO PRIOR REQUEST

16. No previous request for the relief sought herein has been made to this or any other court.

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WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other and further relief as may be just and proper.

Dated: March 16, 2026
Wilmington, Delaware

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*Proposed Counsel for Debtors
and Debtors in Possession*

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: Reliz Technology Group Holdings Inc., Debtor. Tax I.D. No. 87-1036265	Chapter 11 Case No. 26-10371 (TMH)
In re: Reliz Technologies LLC, Debtor. Tax I.D. No. 83-3711968	Chapter 11 Case No. 26-10373 (TMH)
In re: Reliz CI LTD, Debtor. Tax I.D. No. N/A	Chapter 11 Case No. 26-10374 (TMH)
In re: Reliz LTD, Debtor. Tax I.D. No. N/A	Chapter 11 Case No. 26-10375 (TMH)

**ORDER (I) DIRECTING JOINT ADMINISTRATION OF
CHAPTER 11 CASES AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)¹ of the Debtors for entry of an order (this “Order”)
(a) directing procedural consolidation and joint administration of the above-captioned chapter 11

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

cases, and (b) granting related relief, all as more fully set forth in the Motion; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and due and sufficient notice of the Motion having been given under the particular circumstances; and it appearing that no other or further notice is necessary; and it appearing that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby

ORDERED, ADJUDGED, AND DECREED that:

1. The relief requested in the Motion is GRANTED as set forth herein.
2. The above-captioned chapter 11 cases (collectively, the “Chapter 11 Cases”) are consolidated for procedural purposes only and shall be jointly administered by the Court under Case No. 26-10371 (TMH).
3. The caption of the jointly-administered cases shall read as follows:

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

RELIZ TECHNOLOGY GROUP HOLDINGS
INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 26-10371 (TMH)

(Jointly Administered)

¹ 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.

4. The foregoing caption satisfies the requirements set forth in the first sentence of Bankruptcy Code section 342(c)(1).

5. A docket entry, substantially similar to the following, shall be entered on the docket of each of the Debtors, other than Reliz Technology Group Holdings Inc., to reflect the joint administration of the Chapter 11 Cases:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure and Rule 1015-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware directing joint administration for procedural purposes only of the chapter 11 cases of: Reliz Technology Group Holdings Inc., Case No. 26-10371 (TMH); Reliz Technologies LLC, Case No. 26-10373 (TMH); Reliz CI LTD, Case No. 26-10374 (TMH); and Reliz LTD, Case No. 26-10375 (TMH). **All further pleadings and other papers shall be filed in and all further docket entries shall be made in Case No. 26-10371 (TMH).**

6. The Debtors shall maintain, and the Clerk of the United States Bankruptcy Court for the District of Delaware shall keep, one consolidated docket, one file, and one consolidated service list for the jointly-administered cases.

7. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise effecting the substantive consolidation of any of the Chapter 11 Cases.

8. The Debtors are authorized to take all actions necessary to implement the relief granted in this Order.

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