

**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)

(Joint Administration Requested)

Related to Docket No. 15

**CERTIFICATION OF COUNSEL REGARDING MOTION OF DEBTORS  
FOR ENTRY OF AN ORDER (I) AUTHORIZING DEBTORS TO FILE A  
CONSOLIDATED CREDITOR MATRIX AND TOP 30 CREDITORS LIST;  
(II) AUTHORIZING REDACTION OF CERTAIN PERSONALLY IDENTIFIABLE  
INFORMATION; (III) AUTHORIZING THE DEBTORS TO SERVE CERTAIN  
PARTIES BY ELECTRONIC MAIL; (IV) APPROVING CERTAIN NOTICE  
PROCEDURES; AND (V) GRANTING RELATED RELIEF**

The undersigned, proposed counsel to debtors and debtors in possession (collectively, the “Debtors”) in the above-captioned chapter 11 cases, hereby certifies as follows:

1. On March 16, 2026, the Debtors filed the *Motion of Debtors for Entry of an Order (I) Authorizing Debtors to File a Consolidated Creditor Matrix and Top 30 Creditors List; (II) Authorizing Redaction of Certain Personally Identifiable Information; (III) Authorizing the Debtors to Serve Certain Parties by Electronic Mail; (IV) Approving Certain Notice Procedures; and (V) Granting Related Relief* [Docket No. 15] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. Subsequent to the filing of the Motion, the Debtors received certain comments to the form of order submitted with the Motion (the “Informal Objections”) from the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”).

<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.



3. The Debtors negotiated in good faith with the U.S. Trustee to resolve the Informal Objections but were not able to reach a resolution with the U.S. Trustee on all of the Informal Objections prior to the hearing to consider, among other things, approval of the Motion held on March 17, 2026 (the “Hearing”).

4. Consistent with further negotiations between the Debtors and the U.S. Trustee during the Hearing and the resolution of the Informal Objections stated on the record at the Hearing, the Debtors have amended the proposed form of order approving the Motion (the “Revised Order”) to reflect the agreement reached between the Debtors and the U.S. Trustee and the Court’s ruling at the Hearing. A copy of the Revised Order is attached hereto as **Exhibit A**, and a redline version of the Revised Order reflecting all changes from the form of order submitted with the Motion is attached hereto as **Exhibit B**.

5. Prior to filing the Revised Order in connection with this Certification, the Debtors circulated the Revised Order to counsel to the U.S. Trustee, who confirmed that the U.S. Trustee does not object to the entry of the Revised Order.

*[Remainder of Page Intentionally Left Blank]*

6. Accordingly, the Debtors respectfully request that the Court enter the Revised Order attached hereto as **Exhibit A** at the convenience of the Court.

Dated: March 18, 2026  
Wilmington, Delaware

**MCDERMOTT WILL & SCHULTE LLP**

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*Proposed Counsel for Debtors  
and Debtors in Possession*

**EXHIBIT A**

**Revised Order**

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**ORDER (I) AUTHORIZING THE DEBTORS TO FILE A  
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PARTIES BY ELECTRONIC MAIL; (IV) APPROVING CERTAIN NOTICE  
PROCEDURES; AND (V) GRANTING RELATED RELIEF**

Upon the motion (the "Motion")<sup>2</sup> of the Debtors for entry of an order (this "Order") (a) authorizing the Debtors to file a consolidated matrix and list of their 30 largest unsecured creditors on a consolidated basis; (b) authorizing the Debtors to redact certain personally identifiable information from all filings on this Court's public docket in these cases; (c) authorizing the Debtors to serve certain parties by electronic mail; (d) approving certain notice procedures; and (e) granting related relief, all as more fully set forth in the Motion; and upon consideration of the First Day Declaration; 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

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

final order consistent with Article III of the United States Constitution; and notice of the Motion having been given in accordance with the Local Rules; 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 Motion is GRANTED as set forth herein.
2. The Debtors are authorized to file a Consolidated Creditor Matrix in the Chapter 11 Cases consistent with Local Rule 1007-2(b) and shall provide debtor-specific lists required under Bankruptcy Rule 1007(d) upon request; *provided, however*, that if any of the Chapter 11 Cases convert to a case under chapter 7 of the Bankruptcy Code, the applicable Debtor shall file its own creditor matrix and provide same to the Clerk's office within fourteen (14) days of any such conversion.
3. The Debtors are authorized to file a consolidated list of the thirty (30) largest unsecured creditors in the Chapter 11 Cases in lieu of each Debtor filing a list of its twenty (20) largest unsecured creditors as required under Bankruptcy Rule 1007(d); *provided, however*, that if any of the Chapter 11 Cases convert to a case under chapter 7 of the Bankruptcy Code, the applicable Debtor shall file a list of its twenty (20) largest creditors within fourteen (14) days of such conversion.
4. The Debtors shall serve the Notice of Commencement via e-mail on (a) customers that (i) have not designated a mailing address under Bankruptcy Rule 2002(g)(1) or 5003(e), (ii) have not expressly requested to be served hard copies by mail, and (iii) have a valid e-mail address on file with the Debtors; and (b) non-customer individual creditors that (i) have not

designated a mailing address under Bankruptcy Rule 2002(g)(1) or Rule 5003(e), (ii) have not expressly requested to be served hard copies by mail, and (c) have a valid e-mail address on file with the Debtors, but no physical address information. The Debtors shall serve all other creditors via regular mail. The Debtors also shall publish the Notice of Commencement as soon as reasonably practicable on the website maintained by the Clams and Noticing Agent.

5. The service requirements of Bankruptcy Rule 2002(g) hereby are modified to permit e-mail service on (i) customers that (a) have not designated a mailing address under Bankruptcy Rule 2002(g)(1) or 5003(e), (b) have not expressly requested to be served hard copies by mail, and (c) have a valid e-mail address on file with the Debtors; and (ii) non-customer creditors that (a) have not designated a mailing address under Bankruptcy Rule 2002(g)(1) or 5003(e), (b) have not expressly requested to be served hard copies by mail, and (c) have a valid e-mail address on file with the Debtors, but no physical address information.

6. Notwithstanding paragraphs 4 and 5 of this Order, to the extent that an e-mail is returned as undeliverable and the Debtors are unable to locate an alternative, working e-mail address, the Debtors shall serve such party at the physical mailing address that the Debtors have on file, if any, by first-class mail, overnight courier, or hand delivery, as appropriate.

7. The Debtors are authorized, pursuant to section 107(c)(1) of the Bankruptcy Code, to redact the names, addresses, e-mail addresses, and phone numbers of the Debtors' individual customers (collectively, the "Protected Parties") from any Court filings that the Debtors or an official committee file, including the Consolidated Creditor Matrix, the Debtors' schedules of assets and liabilities and statements of financial affairs, professional retention applications, and any certificates or affidavits of service (collectively, the "Public Filings"); *provided, however*, that the authorization to redact the name of a Protected Party from a Public Filing does not apply to

circumstances when such name is being disclosed as that of a director, officer or manager. The Debtors are authorized, pursuant to section 107(c)(1) of the Bankruptcy Code, to redact (i) the names, addresses, e-mail addresses, and phone numbers of the Debtors' current and former employees and individual shareholders, and (ii) the addresses, e-mail addresses, and phone numbers of the Debtors' current and former directors, managers, and officers from the Public Filings. Any service by the Debtors or an official committee on the Debtors' employees and other individual creditors or customers (including but not limited to service of any bar date notice) shall be made to their residential addresses or e-mail addresses, as applicable, in accordance with paragraphs 4-6 of this Order.

8. Notwithstanding anything to the contrary in the order relating to the appointment of the Claims and Noticing Agent, or any Local Rules or Bankruptcy Rules, the Claims and Noticing Agent is authorized to: (i)(a) suppress from the Claims Register the names, addresses, e-mail addresses, and phone numbers of all Protected Parties, and (b) file affidavits and declarations of service without disclosing the names, addresses, or e-mail addresses of Protected Parties; (ii)(a) suppress from the Claims Register the names, addresses, e-mail addresses, and phone numbers of the Debtors' current and former employees and individual shareholders, and (b) file affidavits and declarations of service without disclosing the names, addresses, or e-mail addresses of such parties; and (iii)(a) suppress from the Claims Register the addresses, e-mail addresses, and phone numbers of the Debtors' current and former directors, managers, and officers, and (b) file affidavits and declarations of service without disclosing the addresses or e-mail addresses of such parties.

9. The Debtors shall provide unredacted copies of all Public Filings that include redactions made pursuant to this Order upon request to (a) the U.S. Trustee and any trustee,

examiner, or official committee appointed in the Chapter 11 Cases, and (b) upon further order of the Court, any other party. The Debtors shall file unredacted copies of all Public Filings that include redactions pursuant to this Order under seal with the Clerk's Office.

10. To the extent a party in interest files a document on the docket in the Chapter 11 Cases that is required to be served on creditors whose information is under seal pursuant to this Order, such party in interest should contact counsel for the Debtors who shall work in good faith, with the assistance of the Debtors' Claims and Noticing Agent, to effectuate the service on such party's behalf (and at such party's expense).

11. Notwithstanding any other provision of this Order to the contrary, the U.S. Trustee is authorized to include, without redaction, the name, address, e-mail address, and/or phone number of any creditor or customer serving on an official committee in the Chapter 11 Cases in any pleadings, including any notice of committee appointment, filed in the Chapter 11 Cases.

12. Nothing in this Order prohibits any customer, creditor, or equity holder from voluntarily identifying itself in connection with the Chapter 11 Cases or voluntarily disclosing any of their contact information. In addition, nothing in this Order exempts any customer, creditor, or equity holder from compliance with Bankruptcy Rule 2019.

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

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

**EXHIBIT B**

**Redline Version of Revised Order**

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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~~ in accordance with the ~~particular circumstances~~ Local Rules; 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

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schedules of assets and liabilities and statements of financial affairs, professional retention applications, and any certificates or affidavits of service (collectively, the “Public Filings”); provided, however, that the authorization to redact the name of a Protected Party from a Public Filing does not apply to circumstances when such name is being disclosed as that of a director, officer or manager. The Debtors are authorized, pursuant to section 107(c)(1) of the Bankruptcy Code, to redact (i) the names, addresses, e-mail addresses, and phone numbers of the Debtors’ current and former employees and individual shareholders, and (ii) the addresses, e-mail addresses, and phone numbers of the Debtors’ current and former directors, managers, and officers from the Public Filings. Any service by the Debtors or an official committee on the Debtors’ employees and other individual creditors or customers (including but not limited to service of any bar date notice) shall be made to their residential addresses or e-mail addresses, as applicable, in accordance with paragraphs 4-6 of this Order.

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officers, and (b) file affidavits and declarations of service without disclosing the addresses or e-mail addresses of such parties.

9. The Debtors shall provide unredacted copies of all Public Filings that include redactions made pursuant to this Order upon request to (a) the U.S. Trustee and any trustee, examiner, or official committee appointed in the Chapter 11 Cases, and (b) upon further order of the Court, any other party. The Debtors shall file unredacted copies of all Public Filings that include redactions pursuant to this Order under seal with the Clerk's Office.

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11. Notwithstanding any other provision of this Order to the ~~above~~contrary, the U.S. Trustee ~~may~~is authorized to include, without redaction, the name, address, e-mail address, and/or phone number of any creditor or customer serving on an official committee in the Chapter 11 Cases in any pleadings, including any notice of committee appointment, filed in the Chapter 11 Cases.

12. Nothing in this Order prohibits any customer, creditor, or equity holder from voluntarily identifying itself in connection with the Chapter 11 Cases or voluntarily disclosing any of their contact information. In addition, nothing in this Order exempts any customer, creditor, or equity holder from compliance with Bankruptcy Rule 2019.

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

| 14. The Court retains ~~exclusive~~ jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.