

**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)

**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**

Pursuant to section 105(a) of title 11 of the United States Code (the “Bankruptcy Code”) and Federal Rule of Civil Procedure 65(b), made applicable to this adversary proceeding by Rule 7065 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the above-captioned debtors and debtors in possession (collectively, the “Debtors”) hereby move (the “Motion”) for

<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.



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entry of an order, substantially the form attached hereto as **Exhibit A** (the “Proposed Order”), for a temporary restraining order and preliminary injunction (i) enjoining continuation of the pending case in the United States District Court for the Northern District of Illinois, captioned *1548199 Alberta Ltd. and Robert J. Bertram v. Reliz Technology Group Holdings Inc., et al.*, Case No. 26-cv-02451 (N.D. Ill. March 5, 2026) (the “Prepetition Litigation”) against certain of BlockFills’ directors and officers filed by alleged creditors of the Debtors (the “Claimants”), or (ii) in the alternative, extending the automatic stay of section 362(a) of the Bankruptcy Code to such directors and officers to prevent continued prosecution of the Prepetition Litigation against them. In support of this Motion, the Debtors respectfully represent as follows:<sup>2</sup>

**RELIEF REQUESTED**

1. Pursuant to section 105(a) of the Bankruptcy Code and Bankruptcy Rule 7065, the Debtors seek entry of a temporary restraining order enjoining Claimants from seeking to continue the Prepetition Litigation against Debtors’ D&Os until after the Court has determined whether it will grant the Debtors’ request for a preliminary injunction for the same relief. Alternatively, to the extent that the automatic stay does not already apply to the D&Os, the Debtors seek an extension of the automatic stay to the D&Os pursuant to section 362 of the Bankruptcy Code.

2. The Debtors further request that the Court not require them to post any bond or security in connection with this temporary restraining order or a preliminary injunction as permitted by Bankruptcy Rule 7065.

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<sup>2</sup> Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to such terms in the *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* (the “Memorandum of Law”), filed concurrently herewith.

**JURISDICTION AND VENUE**

3. This Court has 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. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of these chapter 11 cases and this Motion is proper in this District under 28 U.S.C. §§ 1408 and 1409.

4. Pursuant to Rule 9013-1(f) of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), the Debtors confirm their consent to the entry of a final order by the Court in connection with this Motion to the extent 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.

**BASIS FOR RELIEF**

5. In support of this Motion, the Debtors rely upon (i) the Memorandum of Law, (ii) the *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*, which attaches documents related to this Motion and is being filed concurrently herewith, and (iii) any additional evidence submitted at any hearing on this Motion.

**RESERVATION OF RIGHTS**

6. Nothing herein is intended to be or shall be construed as an admission to the validity of any claim against the Debtors or a waiver to the Debtors’ or any party’s rights to dispute any

claim. The Debtors expressly reserve the right to move to enjoin any other action against its D&Os or any other similarly-situated people.

**NOTICE AND NO PRIOR REQUEST**

7. The Debtors will serve a copy of this Motion and the accompanying Memorandum of Law on Claimants in the Prepetition Litigation, the Office of the United States Trustee for the District of Delaware, and all parties who have entered an appearance in the Debtors' chapter 11 cases. In light of the relief requested herein, the Debtors submit that no other or further notice need be provided.

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

*[Remainder of Page Intentionally Left Blank]*

**WHEREFORE**, the Debtors respectfully request entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and proper.

Dated: March 25, 2026  
Wilmington, Delaware

**MCDERMOTT WILL & SCHULTE LLP**

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*Proposed Counsel for Debtors  
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**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
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**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**

Upon consideration 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*

<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.

*and Officers to Prevent Continued Prosecution of Prepetition Litigation Against Them* (the “Motion”); and the Court having considered and reviewed the Debtors’ *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* (the “Verified Complaint”) and the *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* (the “Memorandum of Law”); and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor,

**THE COURT HEREBY FINDS AND DETERMINES that:**<sup>2</sup>

- A. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§157 and 1334;
- B. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2);
- C. Venue for this matter is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409;
- D. Notice of the Motion was sufficient under the circumstances; and
- E. The factual and legal bases set forth in the Motion, the accompanying Memorandum of Law, and at the hearing establish just cause for the relief granted herein.

**NOW, THEREFORE,** based on the foregoing and for other good and sufficient cause, **IT IS HEREBY ORDERED** that:

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<sup>2</sup> To the extent any findings of fact constitute conclusions of law, they are adopted as such, and vice versa.

1. The Motion is GRANTED as set forth herein.
2. Pending a hearing and determination of the Debtors' request for a preliminary injunction and extension of the automatic stay, effective immediately, Claimants 1548199 Alberta Ltd. and Robert J. Bertram are enjoined under section 105(a) of the Bankruptcy Code and Federal Rule of Civil Procedure 65(b) from continuing or filing any action or legal proceeding (including, without limitation, any judicial, quasi-judicial, administrative or regulatory action, proceeding or process whatsoever), by way of direct claim, counterclaim, cross claim, appeal or any other action against the Debtors' D&Os, including in the United States District Court for the Northern District of Illinois, captioned *1548199 Alberta Ltd. and Robert J. Bertram v. Reliz Technology Group Holdings Inc., et al.*, Case No. 26-cv-02451 (N.D. Ill. March 5, 2026) until the earlier of April \_\_\_, 2026 or the hearing date and time of the hearing set forth below (the "Expiration Date").
3. The hearing ("Hearing") on the Motion with respect to the preliminary injunction and extension of the automatic stay shall be held on April \_\_\_, 2026, at \_\_\_\_\_ (Eastern Time). Any objection or response to the Motion with respect to the preliminary injunction and extension of the automatic stay shall be filed and served upon the Debtors so as to be received by no later than April \_\_\_, 2026, at 4:00 p.m. (Eastern Time).
4. This Order shall remain in effect through the Expiration Date or such earlier or later date as may be established by the Court at the request of any party or as the parties may agree.
5. Pursuant to Bankruptcy Rule 7065, the Debtors are relieved from posting any security pursuant to Rule 65(c) of the Federal Rules of Civil Procedure.
6. The terms and conditions of this Order shall be effective immediately.

7. This Court retains jurisdiction with respect to all matters arising from or relating to the interpretation, implementation or enforcement of this Order.