

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

In re:

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

Debtors.

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

Plaintiffs,

v.

1548199 ALBERTA LTD. and ROBERT J.
BERTRAM,

Defendants.

Chapter 11

Case No. 26-10371 (TMH)

(Jointly Administered)

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

Obj. Deadline: *At the hearing*

Hrg. Date: 3/26/26 at 10:00 a.m. (ET)

Related to Adv. Docket Nos. 1, 3, 4, 5, 6

**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**

PLEASE TAKE NOTICE that on March 25, 2026, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed (i) a complaint [Adv. Docket No. 1] (the “Complaint”) initiating the above-captioned adversary proceeding and (ii) the related *Motion of*

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.



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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 [Adv. Docket No. 3] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that, in support of the Motion, Debtors filed (i) 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* [Adv. Docket No. 4] (the “Memorandum of Law”) and (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* [Adv. Docket Nos. 5 (sealed), 6 (redacted)] (the “Declaration”). Copies of the Complaint, Motion, Memorandum of Law, and redacted Declaration are being served with this Notice.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion, solely with respect to the request for a temporary restraining order and an extension of the automatic stay, will be held on **March 26, 2026, at 10:00 a.m. (Eastern Time)** before the Honorable Thomas M. Horan, United States Bankruptcy Judge, United States Bankruptcy Court for the District of Delaware, 824 Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801. Responses, if any, to the Motion, can be made at the Hearing.

Dated: March 25, 2026
Wilmington, Delaware

MCDERMOTT WILL & SCHULTE LLP

/s/ David R. Hurst

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*Proposed Counsel for Debtors
and Debtors in Possession*