Docket #0013 Date Filed: 3/27/2026

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

IN RE:	Chapter 11
RELIZ TECHNOLOGY GROUP HOLDINGS INC., et al,	Case No. 26-10371(TMH)
Debtors.	824 Market Street Wilmington, Delaware 19801
	Thursday, March 26, 2026
RELIZ TECHNOLOGY GROUP HOLDINGS INC., et al,	Adv. Proc. 26-50224(TMH)
Plaintiffs,	
vs.	
1548199 ALBERT LTD. and ROBERT J. BERTRAM,	
Defendants.	

TRANSCRIPT OF HEARING RE:
EMERGENCY TRO MATTER
Reliz Technology Group Holdings, Inc., et al., v. 1548199 Alberta Ltd., et al ., Adv. Pro. No. 26-50224
Motion of Debtors for Entry of Temporary Restraining Order and Preliminary Injunction (I) Enjoining Continuation of Certain Pre-Petition 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; Filed 3/25/26]
BEFORE THE HONORABLE THOMAS M. HORAN
UNITED STATES BANKRUPTCY JUDGE

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(Proceedings commence at 10:01 a.m.)

(Call to order of the Court)

THE COURT: Please be seated.

Good morning, Mr. Hurst. How are you?

MR. HURST: Good morning, Your Honor. For the record, David Hurst, McDermott, Will & Schulte, on behalf of the debtors and debtors-in-possession in these cases.

First, Your Honor, thank you very much for scheduling this hearing so quickly, we really appreciate it.

With me on Zoom today is Mr. Mark Renzi. He's the debtors' chief restructuring officer.

THE COURT: Yes.

MR. HURST: He's also the signatory for the complaint that we filed, the verified complaint we filed initiating this adversary proceeding.

And in the courtroom today, on my right, my colleagues Joe Evans and Dan Kaltman; Mr. Evans will be doing the argument today.

Your Honor, as you saw from the agenda, there's just one item on the agenda today, and that's the debtors' motion for a temporary restraining order enjoining the continuation of certain litigation in Illinois --

THE COURT: Yes.

MR. HURST: -- or, in the alternative, extending the automatic stay to the direct -- debtors' directors and

officers to prevent the litigation against those directors and officers.

Your Honor, unless you have any initial quesitons for me, I'm happy to turn the podium over to my colleague Mr. Evans to --

THE COURT: Yeah, I'm happy to hear from the parties.

MR. HURST: All right.

THE COURT: Okay. Thank you.

MR. HURST: Thank you, Your Honor.

THE COURT: Good morning. Welcome.

MR. EVANS: Good morning. Joseph Evans, McDermott, Will & Schulte.

Your Honor, first, we'd like to move into evidence Adversary Proceeding Docket Number 1, which is the verified affidavit -- verified complaint, and Adversary Proceeding Document 5, which is the declaration of David Hurst and assocaited exhibits.

THE COURT: Okay. Does anybody object to the admission of the verified complaint and Mr. Hurst's declaration purely for the purposes of today's hearing?

MR. GELLERT: Your Honor, this is Ronald Gellert, Gellert --

THE COURT: Mr. Gellert --

MR. GELLERT: -- Seitz --

THE COURT: -- good morning.

MR. GELLERT: -- Busenkell & Brown.

I'm not sure if my co-cousnel wishes to speak. It looks like they're having some technical issues right there --

THE COURT: Yes.

MR. GELLERT: -- so we'll just hold off a second.

And let me introduce him. It's Thomas Patterson from the Patterson Law Firm, from Chicago. His *pro hac* --

MR. GELLERT: -- has been admitted under D.I. 85.

THE COURT: Yes. Yeah, I had the pleasure of granting that motion.

MR. GELLERT: Okay. Thank you.

THE COURT: Why don't we give Mr. Patterson just a second --

MR. GELLERT: Yeah, okay.

THE COURT: -- to get --

MR. GELLERT: My apologies, Your Honor.

THE COURT: Okay. No worries, Mr. Gellert. No worries.

(Pause in proceedings)

THE COURT: And happy opening day to all who celebrate.

Okay. Mr. Patterson, can you hear us okay?

(No verbal response)

THE COURT: It looks like the answer is no.

(Laughter)

THE COURT: Okay. In the spirit of the day that it is, Mr. Gellert, I may ask you to pinch hit.

MR. GELLERT: Yes. Oh, good one.

(Laughter)

MR. GELLERT: With respect to the admission of the complaint and -- you know, obviously, the fact that we haven't had the opportunity to look at sort of the things being asserted in there, I mean, they can be admitted for the purpose of, you know, this is what you say they are, but we can't agree that they are all purposeful -- you know, all true and all those things without having the opportunity to really kind of vet them.

THE COURT: Understood.

MR. GELLERT: So, for the record, in terms of determining a TRO, yeah, sure --

THE COURT: Yes.

MR. GELLERT: -- but not for the truth of the matter that there's -- you know, if they're later to say oh, well, they're admitted in the record, you know.

THE COURT: Understood, understood. It's purely for the purposes of today's hearing and --

MR. GELLERT: Yes.

THE COURT: -- and certainly --

MR. GELLERT: I'm not trying to --

THE COURT: -- your clients --

MR. GELLERT: -- trip them up. I just don't want to --

THE COURT: No. Your clients' rights to contest the complaint and to ultimately test any of the contents of the declarations and supporting is reserved.

MR. GELLERT: All right. Great. Thank you, Your Honor.

THE COURT: Okay. Thank you, Mr. Gellert.

(Verified Adversary Complaint at A.D.I. 1 received in evidence)

(Sealed Declaration of David Hurst and Associated Exhibits at A.D.I. 5 received in evidence)

THE COURT: Okay. Mr. Evans.

MR. EVANS: Thank you, Your Honor.

The debtors filed this adversary proceeding and motion for a TRO to enjoin the Illinois litigation against three of BlockFills' directors and officers.

The Illinois litigation was brought by two creditors, alleging that BlockFills, the debtors, violated their terms and conditions by commingling assets, and that BlockFills has made misrepresentation concerning the safety of those assets. There are 11 counts, 9 against the company and 2 against the three directors and officers. And they all

seek essentially the same thing, which is the return of crypto that was provided by the plaintiffs in that case to BlockFills.

THE COURT: Yes.

MR. EVANS: On March 20th, the Northern District of Illinois stayed the Illinois litigation as to the debtors. There are two remaining counts: Count 5, aiding and abetting fraud; and Count 10, which is a breach of fiduciary duty claim.

In that order, Judge Kennelly stated that he was seeking further advice from a Bankruptcy Court regarding the extent of the automatic stay as it related to the individual defendants. Accordingly, we filed this adversary proceeding and this application.

The stay should be extended to the claims against the D&Os for four primary reasons:

One --

THE COURT: Well, let me ask you one question, though.

MR. EVANS: Sure.

THE COURT: The relief that you're seeking today is under Section 105 and Rule 65. As I read the proposed order, you're not seeking any relief or any findings under Section 362 today. Am I misunderstanding the proposed form of order?

MR. EVANS: The proposed form of order was in the

alternative, I believe, Judge, so, yes, you're right, the primary relief we are seeking is under 105, which is a TRO, until we have a final hearing on the extension of the automatic stay.

THE COURT: Okay.

MR. EVANS: And some of the things we're going to be arguing today, Judge, are -- relate to 362, which goes to the likelihood of success on the merits, and that's why we're arguing about those things, relevant --

THE COURT: Okay.

MR. EVANS: -- but yes, the relief we're seeking is under 105(a).

THE COURT: Okay. Fair enough.

MR. EVANS: The stay should be stayed -- the stay should be extended to the D's and O's for four reasons:

One, the cases against the D's and O's are inextricably interwoven with the conduct of the Debtors/BlockFills.

Two, adjudicating the case against the D's and O's will necessarily decide issues that are critical to this bankruptcy proceeding.

Three, there will be significant costs in defending the action against the D's and O's.

And four, the fiduciary duty acts claim and -- specifically, we contend is an estate cause of action that

should be stayed.

First, our read of the complaint is that this is really a claim against BlockFills and not the debtor -- and not the directors and officers.

In each of the allegations concerning representations that were made prior to plaintiffs' deposit to BlockFills, the plaintiffs actually identify other BlockFills employees, not any of the defendants. That's Complaint 20, 21, 22, 23, 25 and 30.

In certain of those allegations, they identify, generally, either BlockFills' representatives of employees other than the defendants --

THE COURT: Uh-huh.

MR. EVANS: -- but never any of the D's and O's.

And plaintiffs' primary allegation is that they were lied to before they made the deposit and, on January 16th, they made this deposit. But none of the statements prior to January 16th relate to any of the defendants. And I raise this because it shows, we think, that this claim is really a claim against BlockFills and not any one of those directors and officers in their personal capacity.

The second issue, commingling. The plaintiffs allege that BlockFills advised plaintiffs that they wouldn't be commingled. And when they say "BlockFills," they can say BlockFills, the company. They refer to BlockFills'

representatives and what they told them, and then they say that BlockFills commingled the assets. They don't say that one of the individual directors and officers commingled the assets or made the decision to commingle the assets or even made the represent -- misrepresentation that the assets would be commingled; instead, they say the company did so. That's why we think it's a claim against the company --

THE COURT: Uh-huh.

MR. EVANS: -- and not the D's and O's.

The only allegation they have specifically to the D's and O's is that, after the fact, *ex post*, February 6th, February 9th, February 20th, there were town halls and other meetings where they said hey, we're in a bad spot, we're putting the gates down, we're not honoring withdrawals, sorry. Those are the allegations against the D's and O's.

In the actual counts, what they say is, quote:

"As former CEO and co-founder of defendant, they must have approved the misappropriation of funds and failed to ensure the proper disclosure of financial conditions."

Accordingly, all of these claims, in reality, are claims against BlockFills, claims about the operations and conduct of BlockFills as a company, as opposed to any one individual director and officer.

In order to prosecute these claims in Illinois, the

Court in Illinois will be tasked with answering critical factual questions that are important to this case, like:

One, did BlockFills commit fraud by its representatives making certain representations to the market?

What did the BlockFills customer agreements actually mean?

Did BlockFills have a special or fiduciary relationship with any of its customers?

Did BlockFills commingle its assets?

Were they allowed to do it? Were they not allowed to do it?

To the extent they're commingled, can you trace them? Can you not trace them?

These were all questions that occurred in this proceeding; that, if we have another proceeding in Illinois deciding the same thing, it runs the risks, two: One, of conflicting rulings, but two, significant costs.

Let's talk about costs for a second. We have three D's and O's, each with their separate counsel, each with indemnification rights under their corporate documents, each with incoming claims, as I suspect. It's a very small D&O insurance policy. And if we're required to continue prosecuting or defending these claims, we'll continue to expend resources that otherwise could be spent on creditors here.

Last, they assert a fiduciary duty claim, which, in our view, is an estate claim. They don't identify any unique facts that make them any different than any other customer. Quite the contrary, they say that they had the same contract that everybody else had and they weren't given their opportunity to edit it. They don't allege any special relationship between them and any particular director and officer. And so these are generalized derivative claims that are owned by the estate and not these two plaintiffs.

Do I need to make any findings about that to rule on the motion today?

MR. EVANS: No. No. To rule on the motion today, there are four factors:

One is whether the movant has shown a reasonable probability of success on the merits. In this context, it's whether we have a shot at reorganizing. In this case, we have a termsheet already on file.

Two, whether the movant will be irreparably injured by denial of the relief. As we describe, there's costs, there's a risk of conflicting rulings, there's distraction.

Three, whether granting preliminary relief will result in even greater harm to the nonmoving party. This case has not been litigated for years; this is three weeks old. And these plaintiffs are part of the ad hoc committee, they're involved in the bankruptcy case. I suspect they'll

be filing a claim and they can adjudicate their claims here.

Four, whether granting the preliminary relief will be in the public interest. We contend yes, that the types of costs and distraction and disruption that this case would cause if it's allowed to proceed against these three directors and officers by these two plaintiffs will cause the type of harm that the automatic stay was intended to stop.

So, for those reasons, we think, at a minimum, the TRO should be granted today.

THE COURT: Okay. Okay. Thank you.

Mr. Patterson, good morning. Can you hear me okay?

MR. PATTERSON: Yes, I can now, Your Honor. There was about a five-minute delay when I could not hear you, but I can now, and thank you very much.

THE COURT: Well, welcome. It's good to have you here.

MR. PATTERSON: Thank you.

Your Honor, we oppose the motion for a temporary restraining order. In my view, it reads more like a motion for a preliminary injunction. And what I propose we do today is have a briefing on their motion and let them piggyback on our previously filed motion to lift the stay, and that we argue both motions on April 16th, as previously set forth by the Court, if that is convenient to the Court.

The facts are, obviously, our client was in

discussions with BlockFills in December of 2025, and he executed an agreement with them in January of 2026. They agreed to keep his bitcoins and cash in trust. And that's according to Exhibit 2, Page 7 of our complaint, and Paragraphs 30 to 32, among other paragraphs in our complaint.

On February 6th, 2026, he submitted a letter of recision and demanded the return of his personal property. That's in Paragraph 53 and Exhibit 13 of our complaint.

When he did not get the return of his property, he filed a complaint on March 6th, 2026. Thus far, there has been no challenge to the merits of the complaint that he filed.

We obtained a temporary restraining order from Judge Kennelly in the Northern District of Illinois on March 6th, 2026.

And they filed this bankruptcy petition on Sunday, March 8th, 2026.

We had a status before Judge Kennelly on March 20th, 2026, and he extended the TRO until April 3rd. We have a status before him on April 1st.

THE COURT: Now my understanding --

MR. PATTERSON: We --

THE COURT: -- is that Judge Kennelly has decided that, on April 1st, he wants to hear what I'm doing with this. You're asking me to forego this stage of the

proceedings and conduct an evidentiary hearing in a couple of weeks. Why would I do that to Judge Kennelly when he's asking a question that he'd like me to answer.

MR. PATTERSON: What I would -- what I will tell Judge Kennelly is that you have the matter under briefing and we have a hearing scheduled for April 16th.

THE COURT: Okay.

MR. PATTERSON: And so --

THE COURT: I'll tell you right now --

MR. PATTERSON: -- not --

THE COURT: -- I'm not going to -- I'm not going to do that to Judge Kennelly. He's asked a question, he deserves an answer, and I'm going to provide a ruling today. What I do in that ruling is still open. But I think I would encourage you to direct your arguments towards the merits of the factors for a preliminary injunction under Section 105(a).

MR. PATTERSON: Okay. I -- obviously, it's a little disconcerting to have them leapfrog my own motion to lift the stay, which sets forth the arguments and the case law for lifting the stay and transferring the entire case to Judge Kennelly.

But let's talk about what they allege in this TRO. They haven't -- as I mentioned, they have not suggested anything to negate the merits of our complaint; that is, they

don't challenge, in any kind of evidentiary way, the fact that this bitcoin can be traced and is a *res*; just as much as a painting is a *res* or a diamond ring is a *res*, this bitcoin was submitted to them in trust and it can be traced and we can recover it.

Our case is not in common with the other creditors, to my knowledge, even though they have listed us in a group with those other creditors, because I don't know any other creditor that had a submission of their bitcoin in cash on -- in January of 2026. I don't know any other claimant or creditor who issued a letter of recision on February 6th, 2026. And I don't know any other claimant or creditor who had their bitcoin swept from a trust account within an hour after depositing it. So this is a constructive trust claim against the companies, and that's why I think it should be heard by Judge Kennelly.

These are personal claims to Mr. Bertram and his company; they are not general claims.

THE COURT: You've pled --

MR. PATTERSON: I know there's --

THE COURT: You've pled --

MR. PATTERSON: -- been some broad --

THE COURT: The language that you include in Count 10 is classic derivative claim type language. You talk about the fiduciary duties that were owed to creditors such as your

client. I --

MR. PATTERSON: Yes.

THE COURT: I've seen --

MR. PATTERSON: And my under --

THE COURT: I've seen a lot of complaints and this is classic derivative claim language. I think it's hard to understand how you're arguing that those are direct claims.

MR. PATTERSON: I -- yeah, I understand that we have that language in that complaint. But remember, no complaint is bad in substance if it notifies them of what we're arguing. And I think the fiduciary aspect of the -- fo this case, they are 180 degrees to the wrong.

I understand that there is a case from the Delaware Supreme Court that says that, based on the zone of insolvency alone, a general creditor will not have a direct claim against the officers of the company, I understand that.

THE COURT: Yes.

MR. PATTERSON: But this is a trust case, a constructive trust case, just as if somebody submitted money to my client fund trust account; and then, if I embezzled it or swept it into my general account, that individual client has a claim against me. It's not the claim of my firm against me, it's a claim of the individual against me for sweeping the money out of the trust account, and so we have an individual claim.

Yes, we say that they should have known that they were insolvent, there's no question we're saying that. But the fiduciary duty claim is an individual claim based on their misappropriation of money that they were supposed to keep in trust; and, therefore, we don't have -- the ruling of the Delaware Supreme Court is not on point in that respect.

And as a matter of fact, even in their brief, at Page 18, they describe two cases which support my point, rather than their point. They say that, if there's a claim that affects an individual, rather than the mass of creditors, then there is a claim individual and it is not a derivative claim. And that's what we are alleging, too, in this situation.

And I direct the Court's attention -- there's two cases that they cite in -- on Page 18 of their brief or motion papers, where they say, if somebody has an individual claim, it's not a general claim, it's not a derivative claim. And so that's the situation that we have here.

The representations that we allege are representations that were personal to him, and it was his agreement. And I don't know if anybody else had a similar agreement with him. That hasn't been determined.

THE COURT: I'm sorry.

MR. PATTERSON: Just because --

THE COURT: Just so --

MR. PATTERSON: -- they enlisted --

THE COURT: -- I understand, who is the "him" and the "his"?

MR. PATTERSON: Sorry.

THE COURT: Which individual are you referring to.

MR. PATTERSON: Sorry, Judge.

THE COURT: That's okay.

MR. PATTERSON: Mr. Bertram.

THE COURT: Mr. Bertram --

MR. PATTERSON: The representations --

THE COURT: Okay.

MR. PATTERSON: -- were made to Mr. Bertram.

THE COURT: Okay.

MR. PATTERSON: And I don't know if the same or similar representations were made to others. And we allege that he had personal conversations with representatives of BlockFills, and that is part of our individual claims and that's unique to him. So I -- it seems to me that we have a unique claim, not a general claim, as to the other creditors or claimants.

Now with respect to the burden, there is no burden that is going to take place in the next 16 days. I'm not going to issue discovery in the next 16 days, I couldn't. I'm not going to make a claim for indemnity and nobody else is going to make a claim for indemnity. There wouldn't be a

claim for indemnity --

THE COURT: How do you --

MR. PATTERSON: -- if we get our --

THE COURT: How do you know --

MR. PATTERSON: -- *res* returned.

THE COURT: -- what their -- what the D&O defendants are going to do? They -- they're going to have to -- they've already incurred costs, I'm assuming. They're going to have to be in front of Judge Kennelly next week. That sounds like a basement -- a basis to write your advancement letter.

MR. PATTERSON: Well, I -- if they had done that, it should have been included in their papers. In other words, this is the dog that did not bark. In the absence of proof, I am saying that they haven't made an indemnity claim and they haven't incurred any indemnity fees and they haven't made a claim to the D&O carrier.

But maybe more important, there won't be an indemnity claim if we get our *res* back. If we get our bitcoin back, there's no insurance that will be paid out, there's no indemnity that will be paid out. We want our bitcoin, we want our *res* returned to us.

As to cost, the status -- the last status before Judge Kennelly was 15 minutes. And so the fact that we have a status on April 1 is not going to be a lengthy hearing.

But I do want clarification on one thing. We say in our motion to lift the stay, at Footnote 4, that our understanding of the first-day motions would not permit them, BlockFills, to access our bitcoin or our cash. And my understanding is that the -- none of the first-day orders that were entered by Your Honor would allow them to do it, in which case then, if -- as long as that's true, then there is no need for me to ask you for a TRO prohibiting that while we litigate these issues, or for asking Judge Kennelly to extend his TRO again while we litigate these issues. So I just mention that to avoid any potential confusion on that. The way I view these first-day orders, the cash collateral orders, it does not affect what Mr. Bertram deposited with the company. So --

THE COURT: If that's true, then --

MR. PATTERSON: -- there is no --

THE COURT: If that's true, then there's no harm to you if I were to -- or to your clients, if I were to enter this order today, right?

MR. PATTERSON: Well --

THE COURT: There's no --

MR. PATTERSON: -- under --

THE COURT: You've just argued that --

MR. PATTERSON: Under --

THE COURT: -- you can't be harmed.

MR. PATTERSON: No, understood. I -- the harm is -- the harm exists, not in the next 16 days, I can see that, right? The issue then is, on the 16th, when you consider our motion to lift the stay, the entire stay, what is the harm at that point. Is there harm to the creditors at that point, or to the bankrupt estate at that point? And I'm willing to have that argument and I'm anticipating having that argument, and that's what I think it should -- that's how I think it should take place.

In other words, there's no emergency now, but -- that's going to take place before the 16th. That negates the issue of the TRO. It doesn't negate their preliminary injunction request. We should have a hearing on that and I'm prepared to brief their motion because I've only had it overnight. And I could submit that by April 6th, which is the date when their response to our motion to lift the stay is also due. So that's what I suggest.

I don't think that the Court should reverse the burden of proof and place it on me to demonstrate an absence of harm. At the TRO stage, the burden is on them to demonstrate that there's extraordinary harm or an emergency here, and there is no emergency here. We set up our briefing in the ordinary course.

And I don't think the Court, respectfully, should reward gamesmanship just because they leapfrogged our motion

to lift the stay and got an earlier hearing date on that. I did not ask for an early hearing date. I wanted my opponents to have time to argue the motion on the merits, and then we'll argue it on the 16th.

So, in the meantime, there is no indemnity, there's no D&O insurance, there's no discovery that's going to be issued, there's no burden. And there won't be any burden, ultimately, on the estate, if we -- the return our property. It's our property.

THE COURT: Well, that's an issue --

MR. PATTERSON: It is --

THE COURT: -- to be --

MR. PATTERSON: -- traceable.

THE COURT: That's an issue to be decided, right?

MR. PATTERSON: That -- yes.

THE COURT: And you may be --

MR. PATTERSON: But on --

THE COURT: You may be --

MR. PATTERSON: -- these papers.

THE COURT: -- right about that, but that's not --

MR. PATTERSON: No, no, no.

THE COURT: That's not --

MR. PATTERSON: I --

THE COURT: -- an issue that I can decide today.

MR. PATTERSON: Well, you can understand -- you

could decide the likelihood, based on the contract that said that they were going to keep it in trust, that's all I'm saying.

In terms of for the next 16 days, there is no likelihood of success on the merits or any emergency that requires immediate action and immediate award. There's no reason for that.

THE COURT: Well, when we look --

MR. PATTERSON: It is --

THE COURT: -- at the likelihood of success on the merits in the context of a bankruptcy case and a motion like this, we're looking at the likelihood that the reorganization will succeed. It's a -- I think --

MR. PATTERSON: And it's --

THE COURT: You're arguing a different issue, I think.

MR. PATTERSON: Well, if -- for example, if we succeed in having the -- compelling the return of our *res*, then the reorganization can proceed without us, without any difficulty. As a matter of fact, they would probably be happy to see us go, right?

THE COURT: I have no doubt.

MR. PATTERSON: So I don't see us -- you know, if anything, we would complicate -- by remaining in the bankruptcy, we would complicate the reorganization because

we're going to assert our individual claim that the *res* is ours.

And so, actually, we have suggested in our motion papers to lift the stay, that duplicative litigation is avoided if you lift the stay and allow Judge Kennelly to decide the case. It's simpler and it's easier and you avoid any kind of *res judicata* or collateral estoppel effect or anything if you just left him decide the matter. And the termsheet that's been discussed among the creditors can either proceed or fail as the parties proceed. But I'm the tail wagging the dog on that. I'm not going to -- not going to get into that, and it would be more confusing for me to do so.

So it is traceable. They haven't negated the fact that it's traceable. That's in Paragraph 49 of our motion to lift the stay and its other -- and therefore, I ask that the Court deny the TRO, but continue the preliminary injunction to April 16th, and let them piggyback on the briefing schedule that we've already set.

We will provide our brief on April 6th, which is faster than we'd normally be entitled to, in order to get this thing herd on a preliminary injunction basis. And that will allow the Court plenty of time to decide what is better, what is better for the bankrupt estate, what is better for us, and you can balance both of those issues. And I think

that provides for a more reasoned decision, rather than rushing it on no briefing from us, just argument, and letting them leapfrog our motion to lift the stay.

THE COURT: Okay. Thank you.

MR. PATTERSON: So I suggest we keep the status quo. Thank you, Judge.

THE COURT: Thank you, Mr. Patterson.

Mr. Evans, any response?

MR. EVANS: Joseph Evans, McDermott, Will & Schulte, for the debtors.

Just a brief response. And I want to start with one of the last things that Mr. Patterson said, is that he wants the Judge in Illinois to determine whether it's his client's *res* or not. Well, what he's asking for is the Judge in Illinois to determine whether the assets provided by BlockFills customers are property of BlockFills' estate or --

THE COURT: No, it's a core issue. I'm --

MR. EVANS: It's a core issue.

THE COURT: I'm not going into that.

MR. EVANS: And with respect to the uniqueness of his client's claims as compared to other creditors, they put in Paragraph 18 of their complaint that it's the same contract that everybody else signed and they weren't able to give an edit, they weren't able to make any negotiations, it was on their website, that was the contract, that's it, and

so these aren't unique claims.

And so, Your Honor, his motion is seeking relief from stay to pursue BlockFills in Illinois. That's a different thing than we're in front of today. Here, today, we're seeking a TRO for the claims against the three directors and officers. And all of the allegations that Mr. Patterson cited about the misrepresentations and the promises and the lies and the things that they're saying they're wronged by, in their complaint, those are all attributable to either BlockFills' representatives or people other than those three D&Os. Their gripe is with the company, and these are company claims and must be stayed.

I have nothing more.

THE COURT: Okay. Okay. Thank you.

I'm going to take a recess for probably about five or ten -- I'm sorry. Does anybody else --

MS. VANLARE: Your --

THE COURT: -- wish to be heard?

MS. VANLARE: Your Honor?

THE COURT: Yes.

MS. VANLARE: Apologies, Your Honor. I have been -- this is Jane VanLare from Cleary, Gottlieb, Steen & Hamilton on behalf of the Ad Hoc Group of BlockFills Customers. And I apologize, I have been trying to log on through Zoom, but just have been unable to do so, so I

apologize for that.

Just very briefly, Your Honor I wanted to express our support in favor of the TRO. We are concerned about the prejudice that may be caused to the estate claims and to the D&O policy, that those are assets should -- that should accrue to the benefit of all of the customers and creditors in this case.

And I think, in the words of Mr. Patterson and the analogy he used, the dog could bark tomorrow, right? They could ask for an indemnity tomorrow. And so we do think it's important to preserve the status quo. And it -- as I think Your Honor articulated and suggested in your questioning, it's clear that there is not a prejudice to the movant here of extending that TRO.

Thank you very much.

THE COURT: Okay. Thank you.

Good morning.

MR. WEBER: Good morning, Your Honor. Robert Weber of Chipman, Brown, Cicero & Cole --

THE COURT: Good to see you --

MR. WEBER: -- representing --

THE COURT: -- Mr. Weber.

MR. WEBER: -- Joseph Perry, the interim CEO.

I had not intended to speak this morning. I just want to make it clear that, if the TRO is not granted today,

there will be an indemnification and advancement request made immediately.

And frankly, I'll be buying a plane ticket to Chicago for the hearing on April 1st because it's an in-person hearing. Even if it will only take 15 minutes of that Court's time, it will take substantially more, and that will be an indemnifiable expense.

THE COURT: Okay. Thank you, Mr. Weber.

MR. WEBER: Thank you, Your Honor.

THE COURT: Appreciate it.

Mr. Samis, good morning.

MR. SAMIS: Your Honor, good morning. First --

THE COURT: Good to have you here.

MR. SAMIS: Good to see you. I don't want it to get lost, happy opening day. I know that you made that remark at the beginning, but I'll just -- I figure I'll carry it forward.

Your Honor, Chris Samis from Ice Miller on behalf of Mr. Hammer.

Your Honor, all I wanted to do was illuminate any speculation. We have already the carriers on notice. The debtors filed their bar date motion yesterday and we're going to be submitting an indemnification claim that we're currently working on now.

So we are incurring costs as this goes and

significant costs. We've been, you know, on the phone with Mr. Hammer trying to establish the facts of the case, so that we're able to adequately defend him in whatever realm we end up ultimately defending him in. But the point is, is that we are incurring costs and they are significant, Your Honor.

THE COURT: Thank you, mister -- very much, Mr. Samis.

MR. SAMIS: Thank you.

THE COURT: Anybody else?

(No verbal response)

THE COURT: Okay. We'll be in a brief recess.

(Recess taken at 10:35 a.m.)

(Proceedings resume at 10:42 a.m.)

(Call to order of the Court)

THE COURT: Okay. Please be seated.

I appreciate the arguments of the parties, but I'm prepared to rule. This is my ruling on the debtors' motion for a temporary restraining order filed at Docket Number 3 in this adversary proceeding, which is Number 26-50224.

I've reviewed the motion, the papers that were filed in connection with the motion, including the Hurst declaration and the attachments to it, and I've considered the arguments of counsel that I've heard today.

I'm going to grant a temporary restraining order under Section 105 of the Bankruptcy Code and Federal Rule of

Civil Procedure 65(b), which is made applicable here by Bankruptcy Rule 7065.

My ruling is going to be narrow this morning. It doesn't address and expressly reserves all questions regarding the scope of the automatic stay under Section 362, including whether the automatic stay already applies to any claims that have been asserted against the D's and O's in the Chicago litigation, and including whether any claims in that litigation are property of the debtors' estates under Section 541 of the Bankruptcy Code. We'll address those questions at a preliminary injunction hearing and we'll talk about scheduling on that. So today's ruling rests solely on Section 105(a).

I'll make the following findings, based upon the verified complaint, which Mr. Renzi has verified under penalty of perjury, and on, again, the Hurst declaration and the exhibits attached to it. These findings are purely for the purposes of this temporary restraining order. They are not findings of fact for any other purpose. And nothing in this ruling should give preclusive effect to any subsequent proceeding in this court or any other court.

The debtors operated under the name BlockFills and they provided cryptocurrency trading, infrastructure, and technology to institutional and professional customers globally, including spot trading, over-the-counter

derivatives, borrowing and lending, and cryptocurrency mining services.

The debtors filed their petitions for relief under Chapter 11 on March 15th, 2026, and these cases are being jointly administered before this Court under Case Number 26-10371, and the debtors are continuing to act as debtors-in-possession.

The individual defendants, Nicholas Hammer is the debtors' former CEO and co-founder, Gordon Wallace is the debtors' president and co-founder, Joseph Patrick Perry is the debtors' interim CEO. And I'll call them, collectively, the "D's and O's."

I make no funding, at this time, regarding the nature, scope, or validity of the claims asserted against the D&Os in the pre-petition litigation in the Chicago, and nothing in this ruling should be considered to constitute a determination of their individual liability or the extent of their respective roles.

On March 20 -- or I'm sorry -- March 5th, 2026, 1548199 Alberta Limited and Robert J. Bertram filed their lawsuit in the United States District Court for the Northern District of Illinois, where the case has been identified as Case Number 26-cv-02451. And that lawsuit names as defendants each of the debtors and the three D&Os who I just identified.

The claimants allege, among other things, that they deposited certain bitcoin and U.S. Dollars with BlockFills in January, and that BlockFills has wrongfully retained and commingled the assets.

The complaint in the pre-petition litigation asserts 11 counts; 9 of those counts are asserted solely against the debtors, 2 counts that are in issue today -- Count 5, which alleges aiding and abetting fraud, and Count 10, which alleges breach of fiduciary duties -- are asserted against these D's and O's.

The pre-petition litigation has been automatically stayed as against the debtors by operation of Section 362. Whether and to what extent any claim in that litigation against the D's and O's is separately stayed by Section 362 is a question that I'll reserve for the preliminary injunction hearing.

On March 5, 2026, the claimants moved for a temporary restraining order in the Illinois District Court, seeking to enjoin BlockFills and the D's and O's from certain activities and to freeze assets that the claimants allege are their property.

And on March 6th, 2026, the Illinois Court did enter an *ex parte* temporary restraining order.

On March 20th, the Court held a telephonic status hearing and extended that order through April 3rd. And as I

understand it, it was conditioned on receiving further advice from this Court regarding the extent of the automatic stay as it relates to the D's and O's.

And an in-person hearing in the Illinois District Court is scheduled for April 1, 2026, which is only six days from today.

Clearly, as I understood the Court's minute entry, the Court is expecting my answer, and I'm giving him an answer.

The indemnification obligations are provided for under the organizational documents of certain of the debtors, and those obligations run in favor of the D's and O's.

Specifically, it appears that the bylaws of Reliz Technology Group Holdings, Inc., which is a Delaware corporation, obligates the corporation to indemnify any person who is or was a director, officer, employee, or agent against expenses incurred in connection with any threatened, pending, or completed litigation. The articles of association of other entities contain similar sort of language. And the Court does find today that continuation of the pre-petition litigation against the D's and O's would trigger or would create a substantial risk of triggering defense costs advancement and indemnification obligations under those provisions.

Again, I'm making no finding at this time regarding

the magnitude of those obligations or whether any particular obligation is enforceable.

The verified complaint states that certain of the D's and O's are integral to the debtors' restructuring efforts. And specifically, the debtors have asserted that the continuation of the pre-petition litigation against those D's and O's would distract key personnel at a critical stage of these Chapter 11 cases, and the Court accepts that representation to be true for the purposes of the TRO.

Since the petition date, the debtors have also been involved in negotiating a framework for an exit plan with an ad hoc group of customers that would provide for a debt-for-equity exchange transaction. I would note that the related termsheet has not been executed, it isn't binding, to my knowledge.

And I make no finding at this time about the likelihood that the debtors will successfully confirm a plan, that question would be reserved for a preliminary injunction hearing. But for the purposes of a TRO today, and for this purpose only, I find that there is no evidence before this Court suggesting that the debtors' restructuring is infeasible or is not likely to succeed.

This is an emergency application. The debtors commenced this adversary proceeding yesterday, on March 25th. And the April 1 hearing date before Judge Kennelly is only

six days away, and the TRO in that court expires on April 3rd. If I were to not act before April 1st, it appears to me that the claimants would seek to proceed against the D's and O's in the Illinois District Court while the core legal questions at issue here, including the extent of the automatic stay and whether those claims are inextricably interwoven with these bankruptcy cases, would remain undecided.

I would note that the debtors have served a copy of the motion on the claimants and they have appeared today.

I clearly have jurisdiction over this proceeding under 28 U.S.C., Sections 157 and 1334. And this matter has been referred to be by the amended standing order of reference from the District Court dated February 29, 2012.

This is a core proceeding under 28 U.S.C. 157(b)(2), and venue is proper here under 28 U.S.C. 1408 and 1409.

To move along to the legal standard under Section 105, it authorizes this Court to issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of Title 11. And a request for injunctive relief under Section 105 is evaluated under the traditional -- or traditional preliminary injunction standard adapted to the Bankruptcy Court, as established in this Circuit by numerous cases. That standard requires the Court to consider four

factors:

First, we'll look at whether there's a reasonable probability of success on the merits of the request for a preliminary injunction;

Whether the movant will suffer irreparable harm absent relief being granted today;

And third, whether granting the relief will result in a greater harm to the nonmoving party;

And fourth, whether granting relief serves the public interests.

This is a balancing test. No single factor determines the analysis.

For the purposes of a TRO, the Court applies the same framework on an expedited basis, given the requirements of Rule 65(b), with particular attention to whether immediate and irreparable harm will result, before the matter can fully be heard.

I note that I -- again, I'm applying Section 105 only. I'm not adjudicating the automatic stay issues. And I'm not determining whether the funds at issue are property of the estate under Section 541. That is for another day. This TRO is designed solely to preserve the status quo and prevent irreparable harm to the estates, pending a full hearing on those questions.

As to the first factor, which is probability of

success on the merits, I find that the debtors have demonstrated a reasonable probability of success on the merits of their request for a preliminary injunction.

Again, my finding is deliberately limited at this stage, but a preliminary injunction under Section 105 is warranted where, among other things, claims against nondebtor codefendants are so intertwined with claims against the debtors that permitting the litigation to proceed would effectively require litigations of issues central to this debtors' reorganization.

Here, the two counts against D's and O's in the pre-petition litigation share their entire factual predicate with the nine counts that are asserted solely against the debtors.

UNIDENTIFIED: Iced white chocolate mocha --

THE COURT: Can you please --

UNIDENTIFIED: -- but with sugar-free vanilla --

THE COURT: -- turn her off?

UNIDENTIFIED: -- and decaf.

THE COURT: Please make a note of the participant for participation at future hearings. We don't need to hear her coffee order.

Count 5, again, alleges aiding and abetting fraud, cannot be adjudicated without a prior determination of whether BlockFills committed the underlying fraud. And

that's a question that is squarely at the center of the debtors' Chapter 11 cases, and that will affect all of the debtors' customers and creditors, not only these two claimants who are before me today.

Similarly, Count 2 raises questions about the D's and O's alleged fiduciary duties to creditors and the conduct of the debtors' business in the period before the petition date. Those are matters that, likewise, will be addressed in this court.

So this Court finds, on the record here, that the debtors have made a sufficient showing of a reasonable probability of success on their Section 105 preliminary injunction claim to warrant interim protection.

I express no view at this time on the merits of the underlying claims or the defenses in the Chicago litigation.

Next, a look at irreparable harm. And I find that the debtors have demonstrated that immediate and irreparable harm to the estates will result absent a TRO. I found three bases for this finding:

First, the debtors have contractual indemnification obligations to the D's and O's under their organizational documents. These allegations are not contingent on a finding of liability. Advancement of defense costs begins when the litigation is initiated. And if the Illinois hearing proceeds on April 1st without relief from this Court,

indemnification obligations will begin accruing against the estates as an immediate and direct consequence, and that would constitute estate harm that can't be undone.

Second, the continuation of the pre-petition litigation creates a concrete risk that factual findings and evidentiary rulings will be made in a proceeding to which the debtors are not parties because of the automatic stay, but from which those findings could, nonetheless, be used against the debtors through principles of estoppel or other principles. And this has been found on numerous occasions, in other cases, to constitute the precise risk of irreparable harm that warrants extension of protection to nondebtor codefendants.

Third, the D's and O's who remain active in the debtors' restructuring will have to contend with the burden of defending complex litigation in the Illinois District Court simultaneously with their obligations to this Court and the debtors and the reorganization process. That's a drain on management time and attention and the resource demands in responding to discovery that would ultimately flow in both directions between the pre-petition litigation and these Chapter 11 cases constitute irreparable harm to the debtors' estates.

The balance of harms, which is another factor to consider, favors entry of a temporary restraining order. As

the claimants argued here, nothing is going to happen in the next 16 days. The harm to the debtors' estates from denial of relief, though, as I've described, is immediate, concrete and, at least in one respect being the accrual of advancement obligations, which is self-executing, should the Illinois proceedings continue.

By contrast, the harm to the claimants from a short duration TRO is limited, as I believe that the claimants have conceded. The pre-petition litigation is already stayed as to the debtors. The claimants' ability to prosecute their nine counts against the debtors is stayed, regardless of what I do with the TRO. But the TRO will temporarily halt prosecution of the two D&O counts only, and only for the short period until this Court conducts a preliminary injunction hearing. Any claims the claimants have preserved and will be addressed in due course in these bankruptcy cases. So, on that record, the balance of harms clearly favors a TRO.

And finally, I'm to look at the public interest, and I find that a TRO serves the public interest here. Congress established the bankruptcy system to provide an orderly and centralized forum for the resolution of claims against a debtor and to provide the debtor with a breathing spell from creditor pressure sufficient to provide time to enable a reorganization. Granting a TRO to allow this Court

to adjudicate the fundamental questions of the scope of the stay, ultimately, and estate property rights, before those questions are potentially rendered moot or prejudiced by proceedings in another forum, serves the very purpose for which Congress enacted the Bankruptcy Code. I'm not going to allow piecemeal litigation in another court to generate preclusive findings on issues that are core to these bankruptcy cases and that would undermine these cases and the potential reorganization.

So I'm satisfied that the specific requirements of Federal Rule of Civil Procedure 65(b) are met. The verified adversary complaint is verified under penalty of perjury by Mr. Renzi. He has stated that he's reviewed the allegation and that they are true to his knowledge. That constitutes a verified pleading sufficient to support emergency relief under Rule 65(b)(1)(A).

I further find that the reasons for granting relief without awaiting a full adversarial hearing are set forth adequately in the papers and supplemented by the evidentiary record and the argument today. The Illinois in-person hearing is six days away. The existing TRO in Illinois expires in nine days. And the time required to schedule and conduct a contested preliminary injunction hearing before this Court makes it impossible to provide the claimants with full advance notice and a response period before April 1,

while still giving this Court's order any practical effect. These circumstances provide the basis required by Rule 65(b)(1)(B) for acting on shorter notice than ordinarily would be required. And I note that counsel for the claimants has appeared today and they have been heard, and I've had the opportunity to consider their arguments.

I'm going to waive the requirement of a bond under Rule 65(c). These debtors are debtors-in-possession under Chapter 11, and requiring a bond would constitute a drain on assets held for the benefit of all creditors, without any corresponding benefit that I can see, given that the harm to the claimants to the TRO is minimal and any claims they may have are fully preserved in the claims process, and particularly given the claimants' argument that they -- the funds attributed to them are held in trust and are not estate assets, anyway. That's an issue for another day, but it certainly supports a finding that a bond is not required.

So, specifically, my ruling is that I will enter a temporary restraining order under Section 105 and Federal Rule 60 -- of Civil Procedure 65(b).

Pending a hearing and determination on the debtors' request for a preliminary injunction, 1548199 Alberta Limited and Robert J. Bertram are enjoined from commencing, continuing, or otherwise prosecuting any action or proceeding against Nicholas Hammer, Gordon Wallace, and Joseph Patrick

Perry, in connection with the claims asserted against them in that pre-petition litigation and any other litigation that they may seek to bring.

And when I talk about the "pre-petition litigation," I am, again, talking about Case Number 26-cv-02451, pending in the United States District Court for the Northern District of Illinois.

The scope of this order is limited to the individual D&Os.

I'm going to schedule a preliminary injunction hearing. Under Rule 65, assuming that the order gets entered today, which is what I'm going to do, I have to hold the hearing within 14 days; 14 days is April 9th, so I'd suggest we get our calendars out and decide on a date.

If you would -- I'd ask the debtors that -- though, if they wish to consult with counsel for the claimants offline on scheduling, that might make sense, too. But my issue, frankly, is that I have extremely limited availability the week of April 6th. In a pinch, I could give you the afternoon of the 8th, but that's the only date that I'm in Delaware that week.

MR. HURST: Your Honor, with the parties' agreement, could we do it on the 16th? I'm just wondering because I remember that Mr. Patterson said he had suggested the 16th as a --

THE COURT: Yeah.

MR. HURST: And I'm wondering, if the parties --

THE COURT: You've --

MR. HURST: -- consent, if --

THE COURT: Yeah, you've got your second-day hearing on the 16th.

MR. HURST: Right.

THE COURT: It's scheduled for 2:30. If -- I could probably move it up a little earlier. But if you think that gives you enough time to accomplish everything -- I know it's a few weeks out and a lot can change. But if you think that it gives enough time to handle everything, I'd certainly be up for that.

MR. HURST: I think we've already cleared that date with our management team, so --

THE COURT: Yeah.

MR. HURST: -- to the extent that Mr. Patterson is agreeable to that, it seems to me that would make sense.

THE COURT: Well, it would also, frankly, be responsive to Mr. Patterson's concerns that the -- that these proceedings are leapfrogging the motion for relief from the automatic stay, which I understand, Mr. Gellert and Mr. Patterson, that's scheduled for April 16th?

MR. GELLERT: Correct, Your Honor.

THE COURT: It is?

MR. PATTERSON: Yes, it is --

THE COURT: So --

MR. PATTERSON: -- Your Honor.

THE COURT: So it also sounds like maybe the fairest path forward, if the parties are amenable to the TRO lasting until the 16th, varying from what the rule requires.

MR. HURST: Well, certainly, it's acceptable to the debtors, but I'll let --

THE COURT: Okay.

MR. HURST: -- Mr. Patterson speak for himself.

THE COURT: Is that acceptable, Mr. Patterson?

MR. PATTERSON: Your Honor, my only concern is, if we're going to have a evidentiary hearing, that I assume, if we take longer than the 16th, that you've got the 17th available, too. And I don't want to be presumptuous --

THE COURT: Oh --

MR. PATTERSON: -- as to what your schedule is.

THE COURT: Yeah, sure. We'd make the time for you without having to come back to Delaware, we can do it --

MR. PATTERSON: Then --

THE COURT: -- in one trip.

MR. PATTERSON: Then I will certainly adhere to what I said, what I told the Court earlier.

THE COURT: Okay.

MR. PATTERSON: I would request, if I can --

THE COURT: Yes, sir.

MR. PATTERSON: -- that the status quo be maintained as to our bitcoin and cash; that is, that it will not be accessed or used in the interim before we have this preliminary injunction hearing. I think that the cash collateral order don't authorize them to do it, but I believe in belt-and-suspenders in certain circumstances, and I don't want to face something where somebody has done something that minimizes or eliminates my ability to trace the bitcoin and cash.

THE COURT: Mr. Hurst, any response to that or do you want to check with your colleagues before responding? I mean, I -- look, I think this is like a really big case issue, right?

UNIDENTIFIED: Yes.

MR. HURST: I don't think we're --

THE COURT: Or whether --

MR. HURST: We're not doing --

THE COURT: -- it's even --

MR. HURST: -- anything with --

THE COURT: I'm just asking.

MR. HURST: -- any bitcoin, really, in the next couple of weeks. I mean, I think --

MR. PATTERSON: As long as the status quo is maintained, Your Honor, that's all I'm asking, at this point.

THE COURT: Yes, understood, Mr. Patterson.

Mr. Evans.

MR. EVANS: So, Your Honor, I'm not exactly sure, when he says "status quo," what he means. But we'll comply with the cash collateral order that's on file. I think that we may have a difference of opinion on what that cash collateral requires or doesn't require and whether it's his *res* or, if he has a -- any kind of special interest that I'm not aware of, then he can come forward with that. But we'll comply with the current order that's on file.

THE COURT: Okay. Mr. Gellert.

MR. GELLERT: Your Honor, I stand because I don't think the cash collateral order really gets too far into this particular issue. So for them, standing before the cash collateral order, it doesn't really address Mr. Patterson's questions.

MR. EVANS: Well, Your Honor, with respect, Mr. Patterson asked to -- he gave his interpretation of the cash collateral order and is asking for something outside of the scope of what this proceeding is about. So, if he wants to make a motion about traceability of his assets and he thinks he can do that, then maybe he should, but I don't think this is the right -- appropriate venue for that discussion.

MR. GELLERT: Then the question then I would have, Your Honor, is: When can we be heard on our TRO?

THE COURT: Well, you haven't filed it yet, so --

MR. GELLERT: I'm saying, you know, that's what --

MR. PATTERSON: We --

MR. GELLERT: That's what we would have to do then, if they're not going to stand by the idea that they're not going to dissipate the *res*.

THE COURT: I'm not going to make any findings of whether the *res* exists or not.

MR. GELLERT: Understood.

THE COURT: It -- what I will --

MR. PATTERSON: All I'm asking is --

THE COURT: What I will order is continuing compliance with all of the debtors' obligations as a debtor-in-possession, including, among other things, compliance with any orders of this Court.

MR. EVANS: And that's what we'll do. Thank you.

THE COURT: Okay? Okay. I've reviewed the form of order and it does -- unless you've discerned any differences, I think it's syncs up with the relief that I've -- I have ordered here on the record today, so I'd be prepared to enter that order if it's uploaded.

MR. HURST: Okay, Your Honor. So I will upload that order, I'll put in the April 16th hearing date. We have to figure out an objection deadline and I'd like to line that up with the objection deadline for the lift-stay motion,

which, right now, is the 6th. It might make sense to move that deadline more to like the 9th --

THE COURT: Yeah.

MR. HURST: -- or -- so that our objection to the lift-stay would be due on the 9th and Mr. Patterson's objection to the -- you know, or briefing with respect to the preliminary injunction would also be due on the 9th, at, say, four o'clock. That would be my proposal.

THE COURT: Well, I'm certainly okay with that.

Mr. Patterson or Mr. Gellert?

MR. PATTERSON: I'm fine with that, Judge.

THE COURT: Okay. Thank you.

So, just for the purposes of clarity, the hearing on the 16th, on the stay relief motion will be an evidentiary hearing, so we'll go forward with all those issues on the same day, the preliminary injunction and the stay relief motion.

MR. HURST: Okay. Now you had said that maybe you'd want to move it up from 2:30, or should we just say 2:30 and we'll see --

THE COURT: Why don't you see how it looks like things are shaking out for that hearing and, if we need to move it up, you know, I may be able to move it up a half-hour or even an hour. But why don't we -- why don't you check in with chambers maybe towards the beginning of the week fo the

13th? And if we can move it or -- we will, and if you think -- but if you think that will be enough time, then we can keep it how it is. Is that all right?

MR. HURST: No. That make sense, Your Honor. And so, when I upload the order, it will say April 16th at 2:30, and --

THE COURT: Yes.

MR. HURST: And I'll check in with chambers and we'll see. Okay.

THE COURT: Yes, please.

MR. HURST: Thank you.

THE COURT: Okay. Is there anything else for me today?

MR. HURST: Nothing from the debtors.

THE COURT: Okay. I appreciate the parties' thoughtful arguments on this, and I'll look forward to seeing everybody back on the 16th. Although I think I'll see you sooner, won't I? Isn't there a second --

MR. HURST: Yes, the --

THE COURT: Yeah, interim DIP --

MR. HURST: I think on --

THE COURT: -- next week?

MR. HURST: -- the 30th or 31st, we have that --

THE COURT: Yeah.

MR. HURST: -- cash collateral interim, second

interim.

THE COURT: Yes, cash collateral. Yes. So I'll look forward to seeing everybody on Tuesday then. Okay. Thank you. We're --

MR. PATTERSON: Thank you, Your Honor.

THE COURT: We're adjourned.

MR. HURST: Thank you, Your Honor.

MR. EVANS: Thank you, Your Honor.

(Proceedings concluded at 11:12 a.m.)

*****

CERTIFICATION

I certify that the foregoing is a correct transcript from the electronic sound recording of the proceedings in the above-entitled matter to the best of my knowledge and ability.



March 26, 2025

Coleen Rand, AAERT Cert. No. 341

Certified Court Transcriptionist

For Reliable