IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: RELIZ TECHNOLOGY GROUP HOLDINGS INC., *et al.*,[1] Debtors.	Chapter 11 Case No. 26-10371 (TMH) (Jointly Administered)
RELIZ TECHNOLOGY GROUP HOLDINGS INC., et al., Plaintiffs, v. 1548199 ALBERTA LTD. and ROBERT J. BERTRAM, Defendants.	Adv. Pro. No. 26-50224 (TMH)

CLAIMANTS' WITNESS LIST AND EXHIBIT LIST
FOR THE HEARING SCHEDULED FOR APRIL 16, 2026 AT 2:30 PM (ET)

Defendants 1548199 Alberta Ltd. and Robert J. Bertram (collectively, "Claimants"), by and through their undersigned counsel, hereby submit their Witness List and Exhibit List in connection with the hearing currently scheduled for April 16, 2026 at 2:30 P.M. (prevailing Eastern Time) (the "Hearing") in the above-captioned cases, related to: 1) *Motion of 1548199 Alberta Ltd. and Robert J. Bertram for Relief from Stay Pursuant to 11 U.S.C. § 362* (the "Stay Motion") [Docket No. 81 in Case No. 26-10371-TMH]; 2) *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting*

[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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Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief (the "Cash Collateral Motion") [Docket No. 16 in Case No. 26-10371-TMH]; and 3) *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 "Preliminary Injunction Motion") [Docket No. 3 in Case No. 26-50224-TMH]. The Claimants designate the following witnesses and exhibits that may be offered at the Hearing.

WITNESSES

1. Any witness listed, offered, or called by the Debtors or any other party.

2. Any rebuttal and/or impeachment witness.

3. Any witness necessary to lay the foundation for the admission of exhibits, including any custodian of records or records keeper of the Debtors.

4. **Robert J. Bertram**, as an individual and in his capacity as a director, officer, and authorized representative of 1548199 Alberta Ltd. Mr. Bertram is expected to testify in support of the requested relief from the automatic stay imposed by Section 362(a) of the Bankruptcy Code to permit Claimants to continue prosecuting the pending litigation initiated by them on March 5, 2026, in the United States District Court for the Northern District of Illinois, Case No. 1:26-cv-02451, before the Honorable Matthew F. Kennelly (the "Illinois Action"). By way of summary and not limitation, Mr. Bertram will testify about the following subjects: the contractual relationship and history between Claimants and Debtors, including the agreements between the parties; his communications with current or former employees or representatives of the Debtors concerning the subjects at issue in the Hearing; the assets (40.001 Bitcoin and

650,050 USD Coin) transferred by Claimants to Debtors on January 16, 2026 (the "Client Assets"); the facts, circumstances, and issues alleged in the pleadings in the above-captioned actions and the Illinois Action; the authenticity of records, and any other relevant matter about which he has personal knowledge.

5. **Mark Renzi**, in his capacity as the Chief Restructuring Officer ("CRO") of debtor Reliz Technology Group Holdings, Inc. Mr. Renzi is expected to testify about the financial condition of the Debtors and factors related to preliminary injunctions.

6. **James P. Brennan**, in his capacity as an expert retained by the Debtors and as the Senior Managing Director and Global Head of Fintech, Payments, and Crypto Compliance and Investigations at J.S. Held. Mr. Brennan is expected to testify about the Debtors' commingling of assets and that he has not conducted a forensic analysis of Claimants' assets.

7. **Fredrix Ortiz** (or another representative from zeroShadow), in his capacity as an expert retained by the Claimants and as a Senior Cybercrimes Analyst at zeroShadow. Mr. Ortiz is expected to testify in support of the Stay Motion and in opposition to the Preliminary Injunction Motion and Cash Collateral Motion. By way of summary and not limitation, Mr. Ortiz will testify about the following subjects: his background, education, career, and employment history; cryptocurrency; his qualifications and his experience in the cryptocurrency industry; the forensic tools and methodologies used for conducting investigations related to cryptocurrency; his role, contributions, and responsibilities as a Senior Cybercrimes Analyst at zeroShadow; his retention by Claimants and/or their counsel related to the above-captioned actions. Mr. Ortiz will also testify about: Mr. Brennan's Declaration (Docket No. 135-2 in Case No. 26-10371-TMH); any other declaration or testimony given by Mr. Brennan in the above-captioned actions; and any rebuttal or supplemental opinions that Mr. Brennan may provide.

EXHIBITS

Exhibit	Document Name	Action	Docket
1	[Blank] Entity Application	Illinois Case No. 1:26-cv-02451	10-2
2	Reliz Ltd. Terms of Business and Client Agreement	Illinois Case No. 1:26-cv-02451	10-3
3	[E-mail] BlockFills Welcome Letter - Account Approved	Illinois Case No. 1:26-cv-02451	10-6
4	[E-mail] Withdrawal Address Update	Illinois Case No. 1:26-cv-02451	10-9
5	Transaction Receipt from Blockchair (50 USDC)	Illinois Case No. 1:26-cv-02451	10-7
6	Transaction Receipt from Blockchair (650,050 USDC)	Illinois Case No. 1:26-cv-02451	10-8
7	Transaction Receipt from Blockchair (40.001 BTC)	Illinois Case No. 1:26-cv-02451	10-10
8	[E-mail] Withdrawal Bank Update	Illinois Case No. 1:26-cv-02451	10-11
9	[E-mail] Demand and Notice	Illinois Case No. 1:26-cv-02451	10-13
10	Formal Notice of Rescission and Demand	Illinois Case No. 1:26-cv-02451	10-13
11	Notice of Potential Director and Officer Liability	Illinois Case No. 1:26-cv-02451	10-13
12	[E-mail] Robert, Confidential Communication -NOT FOR DISTRIBUTION- Temporary Suspension of Client Deposits and Withdrawals	Illinois Case No. 1:26-cv-02451	10-12
13	BlockFills' Statement on Recent Temporary Suspension on Client Deposits/Withdrawals: 02/11/2026	Illinois Case No. 1:26-cv-02451	10-14
14	*Ex Parte Temporary Restraining Order*	Illinois Case No. 1:26-cv-02451	9
15	*Minute Entry*	Illinois Case No. 1:26-cv-02451	24
16	*Minute Entry*	Illinois Case No. 1:26-cv-02451	25
17	*Minute Entry*	Illinois Case No. 1:26-cv-02451	26
18	Debtors' Responses to First Set of Requests for Production	Adv. Pro. No. 26-50224-TMH	x
19	Debtors' Responses to First Set of Interrogatories	Adv. Pro. No. 26-50224-TMH	x

Claimants additionally include the following exhibits: any other document or pleading filed in the Debtors' jointly administered bankruptcy cases (Case No. 26-10371-TMH), adversary proceedings (include Adv. Pro. No. 26-50224-TMH), or the Illinois Action (Case No. 1:26-cv-02451); any document necessary for impeachment and/or rebuttal purposes; any exhibit listed, designated, identified, or offered by the Debtors or any other party; and any documents produced pursuant to subpoenas issued in connection with the Hearing.

RESERVATION OF RIGHTS

Claimants reserve the right to amend or supplement the Witness List and Exhibit List herein as necessary in advance of the hearing and/or in compliance with the Local Rules and prior orders of the Court. Claimants further reserve the right to provide any documents included in this

Exhibit List to opposing counsel and to this Court as they become available, and to introduce into evidence any documents or exhibits designated by any other party.

Respectfully submitted,

Dated: April 14, 2026

/s/ Ronald S. Gellert

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