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

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| In re:<br><br>RELIZ TECHNOLOGY GROUP HOLDINGS INC., *et al.*, [1]<br><br>Debtors. | Chapter 11<br><br>Case No. 26-10371 (TMH)<br><br>(Jointly Administered)<br><br>**Related to Docket Nos. 16, 17, 81, 135, 153** |
| RELIZ TECHNOLOGY GROUP HOLDINGS INC., *et al.*,<br><br>Plaintiffs,<br><br>v.<br><br>1548199 ALBERTA LTD. and ROBERT J. BERTRAM,<br><br>Defendants. | Adv. Pro. No. 26-50224 (TMH)<br><br>**Related to Adv. Docket Nos. 1, 3** |

**DEBTORS' *AMENDED*[2] WITNESS AND EXHIBIT LIST**
**FOR APRIL 16, 2026 (2:00 P.M. ET) HEARING**

Reliz Technology Group Holdings Inc. and its affiliated debtors and debtors in possession (collectively, the "Debtors") in the above-captioned chapter 11 cases (the "Chapter 11 Cases") hereby submit their list of witnesses and exhibits in connection with the hearing scheduled in the Chapter 11 Cases for April 16, 2026, at 2:00 p.m. (ET) (the "Hearing").

**WITNESSES**

The Debtors may elicit testimony from the following individuals at the Hearing:

[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.

[2] **Amended items appear in bold.**

1. **Mark Renzi**. The Debtors will offer by declaration the testimony of Mr. Renzi in connection with (i) the *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling A Final Hearing; and (IV) Granting Related Relief* [Docket No. 16] (the "Cash Collateral Motion"); (ii) the *Motion of 1548199 Alberta Ltd. and Robert J. Bertram for Relief from Stay Pursuant to 11 U.S.C. § 362* [Docket No. 81] (the "Lift Stay Motion"); and (iii) 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 No. 3] (the "Preliminary Injunction Motion"). Specifically, the Debtors will introduce into evidence (a) the *Declaration of Mark Renzi in Support of Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief* [Docket No. 17]; (b) the *Declaration of Mark Renzi in Support of the Objection of Debtors to Motion of 1548199 Alberta Ltd. and Robert J. Bertram for Relief from Stay Pursuant to 11 U.S.C. § 362* [Docket No. 135-1]; and (c) the *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* [Adv. Docket No. 1]. The Debtors also anticipate offering supplemental in-person direct examination of Mr. Renzi.

2. **James P. Brennan**. The Debtors will offer by declaration the testimony of Mr. Brennan in connection with the Lift Say Motion. Specifically, the Debtors will introduce into evidence the *Declaration of James P. Brennan in Support of the Objection of Debtors to Motion of 1548199 Alberta Ltd. and Robert J. Bertram for Relief from Stay Pursuant to 11 U.S.C. § 362* [Docket No. 135-2]. Although the Debtors do not anticipate offering supplemental in-person direct examination of Mr. Brennan, Mr. Brennan will appear in person at the Hearing and be available to the extent that supplemental in-person direct testimony from Mr. Brennan is required.

The Debtors reserve the right to (a) call any witness identified by any other party in connection with the Cash Collateral Motion, the Lift Stay Motion, or the Preliminary Injunction Motion; (b) call any witnesses necessary to rebut the testimony of any witness called or designated by any other party; and/or (c) offer additional live testimony of the above-listed witnesses. Further, the Debtors reserve the right to amend or supplement this witness list at, or in advance of, the Hearing.

**EXHIBITS**

| No. | Exhibit Description | Offered | Objection | Admitted |
|---|---|---|---|---|
| 1 | *Declaration of Mark Renzi in Support of Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief* [Docket No. 17] | | | |
| 2 | *Declaration of Mark Renzi in Support of the Objection of Debtors to Motion of 1548199 Alberta Ltd. and Robert J. Bertram for Relief from Stay Pursuant to 11 U.S.C. § 362* [Docket No. 135-1] | | | |
| 3 | *Declaration of James P. Brennan in Support of the Objection of Debtors to Motion of 1548199 Alberta Ltd. and Robert J. Bertram for Relief from Stay Pursuant to 11 U.S.C. § 362* [Docket No. 135-2] | | | |

| No. | Exhibit Description | Offered | Objection | Admitted |
|---|---|---|---|---|
| 4 | *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* [Adv. Docket No. 1] | | | |
| **5** | **March 26, 2026 Hearing Transcript Regarding Emergency TRO** | | | |
| **6** | **Blockchain Explorer for Bitcoin Wallet Address: 1Bwk9Cq7P8dKSB2cbMmkWn8PW5WvmSBzBs** | | | |
| **7** | **Blockchain Explorer for Bitcoin Wallet Address: bc1q3w9rft55pmpleas5qlanh5tx502tmghytqt7p3** | | | |
| **8** | **Blockchain Explorer for Bitcoin Wallet Address: bc1qvwc0cjq8hglzw9vrt6ppfyvk8uxfluzc9dqwdq** | | | |
| **9** | **Blockchain Explorer for Bitcoin Wallet Address: bc1qz9ztwc4z33lvxl5yqamzhadek96qxw6dcf7p47** | | | |
| **10** | **Blockchain Explorer for Bitcoin Wallet Address: bc1qhk6dk3mng6kc2fwcqpv27xaxy3ygftagt0v5gj** | | | |
| **11** | **Blockchain Explorer for Bitcoin Wallet Address: 3M69B9AunRknnHE3hkkMhaU1yeuUTMpeax** | | | |
| **12** | **Blockchain Explorer for Bitcoin Wallet Address: 37YjVQLVwCMrqSnomSqHELhigYB163qjSc** | | | |
| **13** | **Blockchain Explorer for Bitcoin Wallet Address: bc1q0y2yp68u0kplgwq44dp5cckqghe9ape95rm7zt** | | | |
| **14** | **Blockchain Explorer for Bitcoin Wallet Address: bc1q3m6xcuq2h6lpvay5px3vnyl4pff0nxwwh2trr3** | | | |
| **15** | **Blockchain Explorer for Bitcoin Wallet Address: bc1qau2cv0ch8y72zmtcrejgld38dg7z8v6p8s4a5slztfl8y3k4ur3spshgv2** | | | |
| **16** | **zeroShadow Findings Report for Alberta Parties & Patterson Law, dated April 15, 2026** | | | |
| **17** | **Corrected Complaint in 1548199 Alberta Ltd. and Robert J. Bertram v. Reliz Technology Group Holdings Inc., et al., Case No. 26-CV-02451 (N.D. Ill.) filed March 6, 2026** | | | |
| **18** | **Balance of Bitcoin Over Time in BlockFills Bitcoin Omnibus Wallet bc1qdkmq7lg595c7k3aldmaxp7a2k2z6q9nfhdp33a** | | | |

The Debtors reserve the right to amend or supplement this exhibit list at, or in advance of, the Hearing, and further reserve the right to use additional exhibits for any purpose, including but not limited to rebuttal or impeachment. The Debtors also reserve the right to rely upon and use as evidence (i) documents produced by any party in interest, (ii) exhibits included on the exhibit lists of any parties in interest, and (iii) any pleading, transcript, or other document filed with the Court in the Chapter 11 Cases.

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Dated: April 16, 2026
Wilmington, Delaware

**MCDERMOTT WILL & SCHULTE LLP**

*/s/ David R. Hurst*

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