Docket #0035 Date Filed: 4/21/2026

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) **Related to Adv. Docket Nos. 3, 34**

AGREED ORDER GRANTING 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 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

[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.

"Motion"); and the Court being advised that 1548199 Alberta Ltd. and Robert J. Bertram (together, the "Defendants") agreed to entry of a preliminary injunction in this adversary proceeding;

THE COURT HEREBY FINDS AND DETERMINES that:

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.

NOW, THEREFORE, based on the foregoing, **IT IS HEREBY ORDERED** that:

1. The Motion is GRANTED as set forth herein.

2. Defendants are enjoined under section 105(a) of the Bankruptcy Code[2] 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 action pending 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 occurrence of the effective date of a plan of reorganization or liquidation in the Chapter 11 Cases (the "Expiration Date") or such earlier or later date as may be established by the Court

[2] 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* [Adv. Docket No. 4].

at the request of any party upon proper motion to vacate or modify the order or as the parties may agree.

3. 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.

4. The terms and conditions of this Order shall be effective immediately.

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

Thomas M. Horan

Dated: April 21st, 2026
Wilmington, Delaware

THOMAS M. HORAN
UNITED STATES BANKRUPTCY JUDGE