Docket #0034 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. 1, 3, 4, 12, 22, 24**

CERTIFICATION OF COUNSEL REGARDING ENTRY OF 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

The undersigned, proposed counsel to debtors and debtors in possession (collectively, the "Debtors") in the above-captioned chapter 11 cases (the "Chapter 11 Cases"), hereby certifies as follows:

[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.

1. On March 25, 2026, the Debtors filed (i) 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 "Verified Complaint"), (ii) 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 "Motion"), and (iii) 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").[2]

2. On March 26, 2026, the Court entered the *Order Granting 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. 12] (the "Temporary Restraining Order").

3. On April 9, 2026, 1548199 Alberta Ltd. and Robert J. Bertram (together, the "Defendants") filed the *Claimants' Response in Opposition to the Debtors' Motion for Entry of a Preliminary Injunction* [Adv. Docket No. 22].

[2] Capitalized terms not defined herein shall have the meanings ascribed to such terms in the Verified Complaint or the Memorandum of Law, as applicable.

4. On April 13, 2026, the Debtors filed the *Debtors' Reply 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. 24].

5. On April 16-17, 2026, the Court held a hearing (the "Hearing") to consider, among other things, entry of a preliminary injunction, as requested by the Debtors in the Motion. At the April 17, 2026 portion of the Hearing, the Debtors announced on the record an agreement among (i) the Debtors, (ii) the Official Committee of Unsecured Creditors (the "Committee"), (iii) Celsius Network Ltd. ("Celsius"), and (iv) 1548199 Alberta Ltd. and Robert J. Bertram (together, "Alberta") regarding, among other things, the consensual entry of an order granting a preliminary injunction (the "Proposed PI Order"), and the Court agreed to enter such order upon submission under certification of counsel. A copy of the Proposed PI Order is attached hereto as **Exhibit A**, and a redline version of the Proposed PI Order relative to the Temporary Restraining Order entered by the Court on March 26, 2026 is attached hereto as **Exhibit B**.

6. Prior to filing this Certification of Counsel, the Debtors circulated their Proposed PI Order to (i) Alberta, (ii) the Committee, (iii) Celsius, and (iv) the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee"). Alberta has consented to entry of the Proposed PI Order, and neither the Committee nor Celsius objects to entry of the order. The U.S. Trustee takes no position regarding entry of the Proposed PI Order.

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Accordingly, the Debtors respectfully request that the Court enter the Proposed PI Order attached hereto as **Exhibit A** at the convenience of the Court.

Dated: April 21, 2026
Wilmington, Delaware

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/s/ David R. Hurst

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Proposed Counsel for Debtors
and Debtors in Possession

EXHIBIT A

Proposed PI Order

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 No. 3**

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.

EXHIBIT B

Redline Version of Proposed PI Order

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 No. 3**

AGREED ORDER GRANTING ~~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

Upon ~~consideration 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*

[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.

and Officers to Prevent Continued Prosecution of Prepetition Litigation Against Them [Adv. Docket No. 3] (the "Motion"); and the Court ~~having considered and reviewed the Debtors' *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* (the "Verified Complaint") and 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* (the "Memorandum of Law"); and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor,~~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:[1]

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~~; and~~ .

[1] ~~To the extent any findings of fact constitute conclusions of law, they are adopted as such, and vice versa.~~

~~E. The factual and legal bases set forth in the Motion, the accompanying Memorandum of Law, and at the hearing establish just cause for the relief granted herein.~~

NOW, THEREFORE, based on the foregoing ~~and for other good and sufficient cause~~, **IT IS HEREBY ORDERED** that:

1. The Motion is GRANTED as set forth herein.

~~2.~~ ~~Pending a hearing and determination of the Debtors' request for a preliminary injunction and extension of the automatic stay, effective immediately, Claimants 1548199 Alberta Ltd. and Robert J. Bertram~~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 ~~earlier of April 16, 2026 or the hearing date and time of the hearing set forth below~~occurrence of the effective date of a plan of reorganization or liquidation in the Chapter 11 Cases (the "Expiration Date")~~.~~

~~3.~~ or ~~The hearing ("Hearing") on the Motion with respect to the preliminary injunction and extension of the automatic stay shall be held on April 16, 2026, at 2:30 p.m. (Eastern Time). Any objection or response to the Motion with respect to the preliminary injunction and extension~~

[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].

~~of the automatic stay shall be filed and served upon the Debtors so as to be received by no later than April 9, 2026, at 4:00 p.m. (Eastern Time).~~

~~4. This Order shall remain in effect through the Expiration Date or~~ such earlier or later date as may be established by the Court at the request of any party upon proper motion to vacate or modify the order or as the parties may agree.

3. ~~5.~~ 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. ~~6.~~ The terms and conditions of this Order shall be effective immediately.

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