Docket #0005 Date Filed: 5/28/2026

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. ARTHA INVESTMENT PARTNERS LLC, Defendant.	Adv. Pro. No. 26-50230 (TMH)

JOINT STIPULATION OF VOLUNTARY DISMISSAL
OF ADVERSARY PROCEEDING WITHOUT PREJUDICE

The Debtors and Artha Investment Partners LLC ("Artha," and, together with the Debtors, the "Parties"), file this *Joint Stipulation of Voluntary Dismissal of Adversary Proceeding Without Prejudice* (the "Stipulation") pursuant to Federal Rule of Civil Procedure 41(a) made applicable by Federal Rule of Bankruptcy Procedure 7041.

WHEREAS, on March 15, 2026 (the "Petition Date"), the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the District of Delaware (the "Court");

[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"). The Debtors' service address is 401 West Ontario St., Suite 400, Chicago, IL 60654.

WHEREAS, prior to the Petition Date, Debtor Reliz Ltd. and Artha entered into those certain (i) Reliz Master Loan Agreement ("MLA") and (ii) term sheets dated November 28, 2025 and December 10, 2025 (the "Term Sheets"), pursuant to which the Debtors were to deliver certain Collateral (as that term is defined in the MLA) to Artha, but the Debtors never delivered the Collateral;

WHEREAS, on February 10, 2026, Artha filed two UCC-1 financing statements with the Illinois Secretary of State and two UCC-1 financing statements with the District of Columbia, purporting to perfect a security interest in the Collateral (the "Purported Liens");

WHEREAS, on April 8, 2026, the Debtors filed the *Debtors' Adversary Complaint for Declaratory Judgment That Defendant is an Unsecured Creditor or, in the Alternative, to Avoid Security Interest Pursuant to 11 U.S.C. § 547* [Adv. Docket No. 1] (the "Adversary Complaint");

WHEREAS, on May 8, 2026, the Parties agreed to extend Artha's time to answer, move, or otherwise plead to the Adversary Complaint to May 26, 2026;

WHEREAS, by this Stipulation, the Parties seek to resolve certain issues related to the MLA, the Term Sheets, the Purported Liens, and the Adversary Complaint pursuant to the terms set forth herein;

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties, through their respective counsel, as follows:

1. The Parties agree that: (i) Artha is a general unsecured creditor of the Debtors; (ii) the Purported Liens are hereby avoided; and (iii) Artha waives, releases, and acquits any right to assert a security interest with respect to the Debtors' cash and cryptocurrency in connection with the MLA, Term Sheets, and Purported Liens. This Stipulation is limited solely to the above-captioned chapter 11 cases and adversary proceeding and shall not constitute an admission, waiver,

or adjudication concerning Artha's rights, remedies, claims, defenses, or status in any other proceeding or forum.

2. Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, as incorporated by Rule 7041 of the Federal Rules of Bankruptcy Procedure, the Parties stipulate to the dismissal of the above-captioned adversary proceeding *without prejudice*, with each party bearing their own fees, costs, and expenses.

3. Except as otherwise provided herein, nothing in this Stipulation, nor any actions taken pursuant hereto, shall be deemed: (a) an admission as to the validity of any claim against any of the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party in interest's right to dispute any claims on any other grounds; (c) a promise or requirement to pay any claim; (d) an implication, admission, or finding that any particular claim is an administrative expense claim, secured claim, or other priority claim; (e) a request or authorization to assume, assign, or reject any agreement, contract or lease pursuant to section 365 of the Bankruptcy Code; (f) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; (g) a waiver or limitation of the Debtors', or any other party in interest's, rights under the Bankruptcy Code or any other applicable law; (h) a waiver, release, acquittal, or adjudication of any claims, causes of action, tracing theories, constructive trust theories, ownership claim, fraud claims, tort claims, remedies, or other rights Artha may possess against the Debtors; or (i) a concession or adjudication concerning Artha's rights, status, or remedies in any non-bankruptcy proceeding or forum outside of these chapter 11 cases.

[Remainder of Page Intentionally Left Blank]

Date: May 28, 2026

MCDERMOTT WILL & SCHULTE LLP

/s/ David R. Hurst

David R. Hurst (I.D. No. 3743)
Andrew A. Mark (I.D. No. 6861)
The Brandywine Building
1000 N. West Street, Suite 1400
Wilmington, Delaware 19801
Telephone: (302) 485-3900
Email: dhurst@mcdermottlaw.com
amark@mcdermottlaw.com

-and-

Darren Azman (admitted *pro hac vice*)
Joseph B. Evans (admitted *pro hac vice*)
R. Ethan Dover (admitted *pro hac vice*)
One Vanderbilt Avenue
New York, New York 10017

Telephone: (212) 547-5400
Email: dazman@mcdermottlaw.com
jbevans@mcdermottlaw.com
edover@mcdermottlaw.com

-and-

Gregg Steinman (admitted *pro hac vice*)
333 SE 2nd Avenue, Suite 4500
Miami, Florida 33131
Telephone: (305) 358-3500
Email: gsteinman@mcdermottlaw.com

Counsel for Debtors and Debtors in Possession

Date: May 28, 2026

CROSS & SIMON, LLC

/s/ *Kevin S. Mann*

Kevin S. Mann (I.D. No. 4576)
1105 N. Market Street, Suite 901
Wilmington, Delaware 19801
Telephone: (302) 777-4200
Email: kmann@crosslaw.com

-and-

QUANTUM LEX PA
John R. Neve (admitted *pro hac vice*)
John Hayden (admitted *pro hac vice*)
6800 France Ave S, Suite 405
Minneapolis, MN 55435
Telephone: (952) 746-2400
Email: jneve@quantumlex.io
jhayden@quantumlex.io

Counsel for Artha Investment Partners LLC