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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Proposed Attorneys for Debtors

In re: POOLIN TECHNOLOGY PTE. LTD., *et al.*, [1] Debtors.	Chapter 11 Case No. 26-18325 (Joint Administration Requested) **Hearing Date: TBD Shortened Notice Requested**

DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) DESIGNATING COMPLEX CHAPTER 11 CASES; (II) ESTABLISHING CERTAIN NOTICE, CASE MANAGEMENT, AND ADMINISTRATIVE PROCEDURES; (III) AUTHORIZING SERVICE TO CERTAIN PARTIES BY EMAIL AND SMS/TEXT MESSAGE; (IV) MODIFYING CERTAIN CREDITOR LIST REQUIREMENTS; AND (V) GRANTING RELATED RELIEF

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

[1] The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtors' federal tax identification number, are: Poolin Technology Pte. Ltd., a Singapore Private Limited Company; Lonestar Dream Inc. (5105); and Lonestar Taproot LLC (4118). The location of the Debtors' service address for purposes of these Chapter 11 Cases is: c/o Michael DuFrayne, CRO, 2564 US Highway 1, PMB #16884166, Lawrence, NJ 08648.

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Poolin Technology Pte. Ltd. ("Poolin") and its affiliated debtors and debtors-in-possession: Lonestar Dream Inc. ("LSD"); and Lonestar Taproot, LLC ("LST" and collectively, the "Debtors"), by and through their undersigned proposed counsel, hereby respectfully move (this "Motion") this Court for entry of an order substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"): (i) designating the above-captioned proceedings as complex chapter 11 cases; (ii) approving and implementing certain notice, case management, and administrative procedures set forth in **Exhibit 1** to the Proposed Order (collectively, the "Case Management Procedures"); (iii) authorizing service to certain parties via email and text message/SMS; (iv) authorizing, but not directing, the Debtors to (a) file a consolidated list of the Debtors' fifty (50) largest unsecured creditors in lieu of filing separate creditor lists for each Debtor, and (b) file a consolidated list of creditors in lieu of submitting a separate mailing matrix for each Debtor; and (v) granting related relief. In further support of the Motion, the Debtors respectfully state as follows:

JURISDICTION, VENUE & STATUTORY PREDICATE

1. The United States Bankruptcy Court for the District of New Jersey (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference from the United States District Court for the District of New Jersey* dated as of September 18, 2012. The Debtors confirm their consent, pursuant to Rule 7008 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue of these proceedings is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are sections 102, 105(a), 107(c), and 521 of title 11 of the United States Code (the "Bankruptcy Code"), rules 1001, 1007, 2002, 9007, 9013, 9014, and 9036 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and rules 1002-2, 1007-1, 9013-1, and 9013-5 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the "Local Rules").

PRELIMINARY STATEMENT

4. As more fully described in the First Day Declaration (defined below), Poolin operated a prominent cryptocurrency platform out of Singapore and served over 35,000[2] clients through Asia. The Majority of the Debtors' creditors are former customers of Poolin, located in China and now in other parts of the world. In or around November 2022, Poolin's cryptocurrency platform ceased operations in light of Chinese regulations and fall in the price of Bitcoin. Before shutting down operations, Poolin primarily communicated with its customers directly through their web-based application platform, and occasionally via email and SMS text message.[3] Consistent with the customary practice of most web-based platforms, Poolin did not request or require the home address of any of its customers. In addition to other customary relief in complex chapter 11 cases, the Debtors hereby request approval of the proposed Case Management Procedures, including authority to serve notice in these cases on certain of their creditors by email and text message and by such other means as may become necessary in the Case upon further Court

[2] The Debtors' books and records reflect users of Poolin's cryptocurrency platform with active accounts in excess of 35,000. The Debtors are working with their professionals and advisors to determine the number of user accounts with balances in excess of $100.00, which is estimated at more than 11,000.

[3] As with most providers of cryptocurrency wallets, Poolin relied on text messaging for a number of multi-factor authentication ("MFA") account functions, including resetting passwords, conducting transactions and gaining access to the wallets or private keys.

consideration and approval. The Debtors further intend to utilize the Poolin Wallet cryptocurrency platform to allow creditors to update their contact information directly, thereby facilitating more effective and reliable service throughout these Chapter 11 Cases.

5. Rather than physical mail, such electronic communications are conventional and consistent with the reasonable expectations of users interacting with an online app, such as Poolin's platform. The Debtors respectfully submit that service of notices and pleadings by email and text message on these parties are reasonably calculated, under all the circumstances, to apprise such parties of these Chapter 11 Cases and afford them an opportunity to respond, thereby satisfying the requirements of due process. Moreover, many of these creditors are located in the People's Republic of China, and the Debtors may not possess complete or reliable ways to obtain physical mailing addresses for such parties, rendering traditional service impracticable and ineffective. Communication by email and text message with these creditors is likely to be the most successful and efficient means of service under the circumstances.

6. Accordingly, the Debtors propose that the proposed Case Management Procedures, including the authority to send notice by email and text message/SMS, represent the most cost-effective and efficient alternative in these Chapter 11 Cases for the Debtors and all other parties in interest while still ensuring due process and fairness are fully satisfied and protected.

BACKGROUND

7. On July 22, 2026 (the "Petition Date"), the Debtors each filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of New Jersey (the "Court"), thereby commencing the above-captioned cases (these "Cases" or these "Chapter 11 Cases"). The Debtors continue to manage their assets as debtors in possession. As of the filing of this Motion, no official committee of unsecured creditors or statutory

committee has been appointed in the Debtors' Cases, and no request has been made for the appointment of a trustee or examiner.

8. Additional factual background regarding the Debtors' current and historical business operations and the events leading to these Chapter 11 Cases is set forth in the *Declaration of Michael DuFrayne in Support of Debtors' Chapter 11 Petitions and First Day Motions* [ECF No. 2] (the "First Day Declaration") filed substantially contemporaneously herewith and incorporated by reference herein.

RELIEF REQUESTED

9. The Debtors seek entry of an order, substantially in the form of the Proposed Order attached hereto as **Exhibit A**: (i) designating these Cases as complex chapter 11 cases; (ii) approving and implementing the Case Management Procedures; (iii) authorizing service to certain parties via email and text message/SMS; (iv) authorizing, but not directing, the Debtors to (a) file a consolidated list of the Debtors' fifty (50) largest unsecured creditors in lieu of filing separate creditor lists for each Debtor, and (b) file a consolidated list of creditors in lieu of submitting a separate mailing matrix for each Debtor; and (v) granting related relief.

10. As described herein, there are thousands of creditors and parties in interest in these Chapter 11 Cases. Mailing notice of all pleadings and other papers filed in these Chapter 11 Cases to each of these parties would be extremely burdensome and costly to the Debtors' estates, even with the help of the Debtors' proposed claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global ("Verita" or the "Claims and Noticing Agent"). The costs of photocopying, postage, and other expenses associated with such large mailings would be excessive and practically prohibitive. The proposed Case Management Procedures are tailored to address such concerns while simultaneously ensuring timely notification to those parties actively

participating in these Chapter 11 Cases and those parties whose rights are directly affected by a given matter, thereby satisfying due process, the Bankruptcy Rules, and the Local Rules.

11. Substantially contemporaneously herewith, the Debtors filed the *Debtors' Motion for Entry an Order (I) Authorizing Redaction of Certain Personally Identifiable Information of Natural Persons; and (II) Granting Related Relief* (the "PII Redaction Motion"). Pursuant to the PII Redaction Motion, the Debtors seek relief permitting them to redact certain personally identifiable information in the publicly filed versions of their mailing matrices, creditor lists, and the service lists contemplated by the proposed Case Management Procedures in order to protect the safety of individuals and comply with the Debtors' obligations under certain laws and regulations.

CASE MANAGEMENT PROCEDURES

12. On November 25, 2009, the Hon. Judith H. Wizmur, Ret., entered the *General Order Governing Procedures for Complex Chapter 11 Cases* (as amended, the "General Order"). The General Order was designed to provide "special scheduling and other procedures" in cases involving certain factors such as a large creditor base or high assets and liabilities. *See* General Order ¶ 1. Debtors seeking complex case treatment commonly file a simple local form application setting forth the factors that warranted complex treatment and an order would be entered designating the cases as "complex cases."[4] The General Order provided that, "[i]n a Complex Chapter 11 Case, counsel for the debtor, at the hearing on First Day Matters, shall: [d]iscuss with

[4] Out of an abundance of caution, the Debtors are seeking authority to designate these Chapter 11 Cases as complex cases in compliance with the General Order, which is considered an archived general order. *See Transcript of First Day Motions, In re SLT HoldCo, Inc.*, No. 20-18268 (MBK), Hr'g Tr. at 17:2–8 (Bankr. D.N.J. July 10, 2020) (noting that the United States Trustee for Region III has "question[ed] whether this relief is necessary in light of the fact that the November 25 [sic], 2009 order is an archived general order"). The Court recently granted similar relief designating debtors' chapter 11 cases as complex cases via substantially similar case management motions. *See, e.g., In re Bed Bath and Beyond Inc.*, No. 23-23359 (VFP) (Bankr. D.N.J. Apr. 25, 2023); *In re BlockFi Inc.*, No. 22-19361 (MBK) (Bankr. D.N.J. Nov. 30, 2022).

the Court, provisions regarding the entry of a proposed case management order in accordance with the instructions set forth in the Guidelines Establishing Case Management and Administrative Procedures For Cases Designated As Complex Chapter 11 Cases [(the "General Guidelines")], a copy of which [was] attached [to the General Order] as Exhibit F." *Id.* ¶ 6(a).

13. Although the General Guidelines were state of the art in 2009, technology has developed rapidly in the years since, and best practices have adjusted accordingly. In light of these changes, the General Guidelines do not satisfy the Debtors' particular needs in 2026—especially considering Poolin's former cryptocurrency business. For example, the General Guidelines require paper service, which is no longer necessary or practicable in light of the fact that, among other things: (i) most people check their email multiple times a day, giving them instant access to pleadings and information electronically served on them; (ii) many people do not check their paper mail with any regularity; (iii) many people do not work from offices five days a week; and (iv) the size of today's chapter 11 cases and the current inflationary environment makes paper service cost prohibitive, even when effectuated via first class mail (i.e., when not served via overnight carrier).

14. In light of these realities, the Debtors seek authority to implement a set of Case Management Procedures—based on and closely correlated with the General Guidelines—that have been tailored to the Debtors' particular facts and circumstances, as well as the practicalities of service and bankruptcy practice in 2026. Even more importantly, these guidelines are in line with the reasonable expectations of the majority of the Debtors' creditor base, which were users of Poolin's cryptocurrency platform.

15. The Case Management Procedures, among other things: (a) establish requirements for filing and serving notices, motions, applications, declarations, affidavits, objections, replies, responses, memoranda, briefs, supporting documents, and other papers filed in these Chapter 11

Cases, including with regard to any contested matters and any related adversary proceedings (collectively, the "Court Filings"), and any orders entered in these Chapter 11 Cases, including with regard to any contested matters and any related adversary proceedings (together with the Court Filings, the "Court Filings and Orders"); (b) delineate standards for notices of hearings and agendas; (c) fix periodic omnibus hearing dates and provide mandatory guidelines for scheduling hearings and setting objection and reply deadlines; and (d) minimize potential burdens on the Court by limiting matters that are required to be heard by the Court.

16. The Debtors believe that the Case Management Procedures will facilitate service of Court Filings and Orders in a manner that will maximize the efficiency and orderly administration of the Chapter 11 Cases, while at the same time ensuring that appropriate notice is provided, particularly to parties who express an interest in these Chapter 11 Cases and those directly affected by a request for relief. In particular, the Case Management Procedures are intended to:

a. Reduce the need for expedited hearings and requests for expedited relief;

b. Provide for omnibus hearings for the Court to consider motions, applications, other pleadings, and any responses thereto, as applicable.

c. Promote consensual resolution of important matters;

d. Assure prompt receipt of appropriate notice by potentially affected parties;

e. Allow for electronic notice in accordance with the Court's electronic filing system (the "ECF System");

f. Provide ample opportunity for parties in interest to prepare for and respond to matters before the Court;

g. Reduce the substantial administrative and financial burden that otherwise may be placed on the Debtors and other parties in interest who file documents in these chapter 11 cases; and

h. Reduce the administrative burdens on the Court and the office of the clerk of the United States Bankruptcy Court for the District of New Jersey (the "Clerk of Court").

17. To ensure that parties in interest in these Chapter 11 Cases are made aware of the Case Management Procedures, the Debtors propose to: (a) serve the Case Management Procedures via electronic mail (where available) or by SMS/text message or regular mail (as applicable) on each of the parties on the Master Service List (as defined in the Case Management Procedures) as soon as practicable after entry of the Proposed Order; (b) publish the Case Management Procedures on the Debtors' restructuring website at https://www.veritaglobal.net/Poolin (the "Case Website"); (c) make the Case Management Procedures readily available upon request to Verita; and (d) maintain the Poolin Wallet cryptocurrency platform a mechanism by which creditors may update their contact information, including email addresses and phone numbers, to ensure that the Debtors maintain accurate and current records for service purposes. If the Case Management Procedures are modified during these Chapter 11 Cases, the Debtors will (a) make updated versions of the Case Management Procedures available on the Case Website, (b) file a notice of the updated procedures (along with a copy of the updated procedures) electronically on the docket, and (c) serve such updated procedures in accordance with the revised Case Management Procedures.

BASIS FOR RELIEF REQUESTED

A. The Court Should Approve Service to Certain Creditors Via Email and Text Message

18. In accordance with the proposed Case Management Procedures, the Debtors request authority to serve certain foreign creditors by email, wherever an email account is available to the Debtors, and alternatively via SMS/text message. Although the Bankruptcy Rules generally require notices to be served on creditors at their addresses, the Bankruptcy Rules give significant latitude to bankruptcy courts for modifying the general rule. *See* Fed. R. Bankr. P. 2002(m); Fed.

R. Bankr. P. 9007. Specifically, Bankruptcy Rule 2002 does not preclude electronic service where otherwise authorized, and it explicitly contemplates court orders modifying notice requirements. Fed. R. Bankr. P. 2002(m); *see also* Fed. R. Bankr. P. 9007 ("When notice is to be given under these rules, the court shall designate, if not otherwise specified herein, the time within which, the entities to whom, and the form and manner in which the notice shall be given."). Likewise, the Court is also authorized to permit electronic service under section 105(a) of the Bankruptcy Code, which provides in relevant part, that "[t]he Court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title." *See* 11 U.S.C. § 105(a). The Debtors submit that permitting electronic service is both the most efficient and efficient means of service available, thereby furthering the core objectives of satisfying due process and efficient administration of the bankruptcy process.

19. Considering the nature of Poolin's former business as an online cryptocurrency platform, and that most of its creditors are Chinese entities and individuals with physical or mailing addresses not reasonably ascertainable, the Debtors respectfully submit that communication by email and SMS/text message with these creditors is likely to be the most successful and efficient means of service under these circumstances. First, it is most likely impossible for the Debtors to obtain complete and reliable mailing information for these parties. Second, electronic communications such as email and SMS/text message are customary and consistent with the reasonable expectations of users interacting with an online app, such as Poolin's online platform. Not only would permitting service by email and text message be the most efficient manner of service for the Debtors and their estates, but also the most likely means of service to facilitate creditor responses because such creditor base already receives all notices electronically from the Debtors. Contrarily, attempting to obtain service addresses for these foreign parties would place

an extreme burden on the Debtors, increasing costs and consuming administrative headroom to the detriment of the Debtors' estates.

20. Courts have found that due process is satisfied by email service when other forms of service are unavailable. *See In re Irish Bank Resol. Corp. Ltd. (in Special Liquidation)*, 559 B.R. 627, 638–40 (Bankr. D. Del. 2016) (holding Yahoo lacked third-party standing to assert the account holder's due process rights and, in any event, that due process had been satisfied by email service of a Rule 2004 motion where the recipient's identity and whereabouts were unknown, and the foreign representatives had no contact information other than the email account). Likewise, bankruptcy courts in similar crypto-related and public facing cases have authorized such electronic service to creditors. *See e.g.*, *In re FTX Trading LTD.*, Case No. 22-11068 (JTD), [ECF No. 425] (Bankr. D. Del. January 9, 2023) (expressly authorizing service to creditors via email in a cryptocurrency case); *In re Cred Inc., et al.*, Case No.20-12836 (JTD) [D.I. 34] (Bankr. D. Del. Nov. 10, 2020) (authorizing debtor cryptocurrency platform to serve creditors via email); *In re BowFlex Inc.*, Case No. 2-12364 (ABA) [ECF No. 74] (Bankr. D. N.J. March 7, 2024) (approving case management and administrative procedures featuring email service where possible); *In re. BlockFi Inc.*, Case No. 22-19361 [ECF No. 54] (Bankr. D. N.J. Nov. 30, 2022) (same); *see generally, In re Bowflex, Inc.*, 674 B.R. 47 (Bankr. D. N.J. 2025) (holding that email service of the proposed sale transaction and previously approved by the court).

21. The Debtors have mailing addresses for the creditors of LSD and LST. The Debtors have only email and phone numbers for the creditors of Poolin which number in the thousands. The Debtors propose to serve all parties for whom a mailing address is known by mail. For any party whose mailing address is unknown, the Debtors propose to effectuate service first by email, where possible, and thereafter by SMS/text message if service by email is unknown or

unsuccessful. Any party in interest receiving service solely by email or text message may elect to receive service by mail by filing a notice of appearance pursuant to section 1109(b) of the Bankruptcy Code and Bankruptcy Rule 2002, designating an address at which service may be effectuated. In addition, the Debtors intend to utilize the Poolin Wallet cryptocurrency platform to allow creditors to update their contact information, including email addresses and phone numbers, directly through the platform. The Debtors believe that permitting creditors to update their contact information through the Poolin platform—a system with which the creditor base is already familiar—will enhance the efficiency and reliability of service in these Chapter 11 Cases and will help ensure that creditors receive timely notice of all proceedings affecting their interests.

22. Additionally, the Debtors anticipate several filings that will pertain only to a small group of parties in interest in these cases, rather than the entire creditor body, making broad distribution of such filings unnecessary and burdensome. To avoid inundating and irritating creditors and parties in interest with irrelevant, non-core notices, the Debtors propose in accordance with the Case Management Procedures that, without requiring such parties to file anything on the Debtors' dockets or further order of this Court, any creditor or party in interest may elect not to receive non-core notices by submitting an inquiry requesting opt-out to either the Debtors' proposed claims and noticing agent, Verita, at https://www.veritaglobal.net/Poolin/inquiry or Debtors' proposed counsel: Stephen M. Packman, Esq., ARCHER & GREINER, P.C. (spackman@archerlaw.com), and/or Alexander J. Andrews, Esq, ARCHER & GREINER, P.C. (aandrews@archerlaw.com); such opt-out shall be effective upon receipt and shall apply prospectively. Notwithstanding any opt-out election, the Debtors will continue to serve all creditors and parties in interest with materials implicating due process, including, without limitation, any bar date notices, plan, disclosure statement, solicitation

packages, ballots, voting instructions, notices of disclosure statement and confirmation hearings and related deadlines, and any other documents that the Court may direct be served notwithstanding an opt-out election.

23. Based on the foregoing, the Debtors submit that implementation of the service procedures proposed herein satisfies the requirements of due process, are within the Court's equitable powers under section 105(a) of the Bankruptcy Code, and appropriate in these Chapter 11 Cases. Therefore, the Debtors respectfully request authority to serve certain parties in interest by email or SMS/text message as set forth herein and in accordance with the Case Management Procedures.

B. The Court Should Designate the Debtors' Cases as Complex Chapter 11 Cases

24. These Chapter 11 Cases satisfy the eligibility standard for designation as a Complex Chapter 11 Case under Local Rule 1002-2. A chapter 11 debtor is eligible for such designation if it has $50 million or more in assets, or $50 million or more in liabilities (aggregated for jointly administered cases), 1,000 or more creditors, or the case may be considered one of high public interest. *See* Local Rule 1002-2. The Debtors satisfy not one but all of the size-based criteria: the Debtors have total assets in excess of $50 million, total liabilities excess of $50 million, and far more than 1,000 creditors and parties in interest across the jointly administered estates.

25. Given the number of creditors and parties in interest, the volume of first-day and second-day relief, the expected motion practice and, and the corresponding notice burden, these Cases cannot be administered efficiently under the procedures generally applicable to ordinary chapter 11 cases. The proposed Case Management Procedures are tailored to these complexities and will conserve estate resources, reduce the burden on the Court and parties in interest, and ensure the orderly administration of these Cases.

26. Accordingly, the Debtors respectfully request that the Court designate these Chapter 11 Cases as Complex Chapter 11 Cases pursuant to Local Rule 1002-2 and the General Order. Although Local Rule 1002-2(b) contemplates that a debtor seeking complex-case designation file the local form *Application for Designation as a Chapter 11 Complex Case*, the relief requested in this Motion and the accompanying proposed Case Management Procedures present the same eligibility facts and case-management framework that the local form and the Complex Case Order would address. In the interest of judicial economy and to avoid duplicative filings, the Debtors submit that designation may appropriately be granted on the basis of this Motion and respectfully request that the Court waive the requirement for a separate local form and enter the relief requested herein.

C. The Court Should Approve the Proposed Case Management Procedures.

27. The Bankruptcy Rules and Bankruptcy Code provide the Debtors with authority to establish notice and case management procedures. As discussed herein, Bankruptcy Rule 2002(a) provides that, unless otherwise ordered by the Court, notice of certain matters must be given to, among others, all of the Debtors' creditors, equity security holders, and other parties in interest. The Bankruptcy Rules further provide that "[t]he court may from time to time enter orders designating the matters in respect to which, the entity to whom, and the form and manner in which notices shall be sent except as otherwise provided by these rules." *See* Fed. R. Bankr. P. 2002(m); *see also* Fed. R. Bankr. P. 9007 ("When notice is to be given under these rules, the court shall designate, if not otherwise specified herein, the time within which, the entities to whom, and the form and manner in which the notice shall be given.").

28. In addition, section 105(a) of the Bankruptcy Code grants bankruptcy courts broad authority and discretion to enforce the provisions of the Bankruptcy Code either under specific statutory fiat or under equitable common law principles. Specifically, section 105(a) provides:

> The court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title. No provision of this title providing for the raising of an issue by a party in interest shall be construed to preclude the court from, sua sponte, taking any action or making any determination necessary or appropriate to enforce or implement court orders or rules, or to prevent an abuse of process.

11 U.S.C. § 105(a).

29. Under section 102(1) of the Bankruptcy Code, where the Bankruptcy Code provides for an action to occur "after notice and a hearing," such action may occur "after such notice as is appropriate in the particular circumstances, and such opportunity for a hearing as is appropriate in the particular circumstances. . . ." 11 U.S.C. § 102(1)(A). Finally, and perhaps most importantly, Bankruptcy Rule 1001 requires the Bankruptcy Rules to be "construed . . . to secure the just, speedy, and inexpensive determination of every case and proceeding." Fed. R. Bankr. P. 1001.

30. The Debtors' Chapter 11 Cases are complex, will be fast-paced, and will involve large numbers of creditors and other parties in interest. The costs and burdens associated with the possibility of frequent and fragmented hearings, plus the costs associated with copying and mailing or otherwise serving all documents filed with the Court to all such entities, will impose an extraordinarily expensive administrative and economic burden on the Debtors' estates, the Court, and the parties in interest. Indeed, constant mass mailings will be extremely costly to the Debtors' estates and will require the Debtors to divert valuable resources to comply with all administrative requirements. Additionally, hard copy mailing is not available for all parties in interest, so the Debtors request to serve such parties, through the Claims Agent, via electronic mail and text message/SMS to ensure service on such parties.

31. Limited notice procedures are routinely established by bankruptcy courts in large chapter 11 cases to reduce the expense of the administration of the estate. *See In re BowFlex Inc.*,

et al., No. 24-12364 (ABA) (Bankr. D.N.J. March 7, 2024); *In re Rite Aid Corporation, et al.*, No. 23-18993 (MBK) (Bankr. D.N.J. Oct. 18, 2023); *In re Cyxtera Technologies, Inc.*, No. 23-14853 (JKS) (Bankr. D.N.J. June 7, 2023); *In re Whittaker, Clark & Daniels, Inc.*, No. 23-13575 (MBK) (Bankr. D.N.J. May 8, 2023); *In re Bed Bath and Beyond Inc.*, No. 23-23359 (VFP) (Bankr. D.N.J. Apr. 25, 2023); *In re David's Bridal, LLC*, No. 23-13131 (CMG) (Bankr. D.N.J. Apr. 17, 2023); *In re BlockFi Inc.*, No. 22-19361 (MBK) (Bankr. D.N.J. Nov. 30, 2022); *In re Aearo Tech. LLC*, No. 22-02890-JJG-11 (Bankr. S.D. Ind. Sept. 30, 2022).

32. For the reasons discussed herein, the Debtors believe that the Case Management Procedures are appropriate and should be approved and implemented. The establishment of the Case Management Procedures will promote the efficient and orderly administration of these Chapter 11 Cases. For these reasons, the Debtors believe that the relief requested herein is in the best interests of the Debtors and their estates and should be approved.

D. Cause Exists to Authorize the Debtors to File a Single Consolidated List of the Top 50 Unsecured Creditors and Prepare a List of Creditors in Lieu of Filing a Separate Mailing Matrix for Each Debtors

33. Section 521(a) of the Bankruptcy Code and Bankruptcy Rule 1007(a)(1) require a debtor in a voluntary chapter 11 case to file a list containing the name and complete address of each of the debtors' creditors. *See* 11 U.S.C. § 521(a); Fed. R. Bankr. P. 1007(a)(1). Additionally, Bankruptcy Rule 1007(d) provides that a debtor shall file "a list containing the name, address and claim of the creditors that hold the 20 largest unsecured claims, excluding insiders." Fed. R. Bank. P. 1007(d). This list is primarily used by the United States Trustee for the District of New Jersey to evaluate the types and amounts of unsecured claims against a debtor and, thereby, identify potential candidates to serve on an official committee of unsecured creditors appointed in a debtor's case pursuant to section 1102 of the Bankruptcy Code.

34. The Debtors request authority to file a single list of their thirty (30) largest general unsecured creditors on a consolidated basis (the "Top 30 List"). The exercise of compiling separate creditor lists for each individual Debtor could consume an excessive amount of the Debtors' and their advisors' limited time and resources. The Debtors believe that the Top 40 List will better aid the U.S. Trustee in its efforts to communicate with these creditors.

35. The Debtors also request permission to maintain a consolidated list of their creditors (the "Consolidated Creditor Matrix"). Allowing the Debtors to prepare and maintain the Consolidated Creditor Matrix in lieu of filing a separate creditor matrix for each Debtor is warranted under the circumstances as there are hundreds of creditors and parties in interest in these Chapter 11 Cases. Converting the Debtors' computerized information to a format compatible with the matrix requirements, as well as having the Debtors prepare separate lists of creditors for each Debtor entity would be expensive, time consuming, administratively burdensome, and increase the risk of error with respect to information already on computer systems maintained by the Debtors or their agents. Finally, the Consolidated Creditor Matrix will promote efficiency and minimize risk of confusion by third parties as it will be a single point of reference for parties-in-interest. Accordingly, the Debtors respectfully request authority to file a single Consolidated Creditor Matrix for all Debtors.

36. The Debtors, working together with Verita as their proposed noticing and claims agent in these Chapter 11 Cases, have already prepared a Top 30 List of the Debtors' creditors in an electronic format. The Debtors are prepared to make the Consolidated Creditor Matrix available in electronic form to any party in interest who so requests it (or in non-electronic form at such requesting party's sole cost and expense), and the Debtors intend to file a copy of the Consolidated Creditor Matrix on the docket of these Chapter 11 Cases.

37. Courts in this jurisdiction have granted relief similar to the relief requested herein. *See, e.g., In re New Rite Aid, LLC,* No. 25-14861 (MBK) (Bankr. D.N.J May 7, 2025) (authorizing a consolidated list of the debtors' fifty (50) largest unsecured creditors); *In re Sam Ash Music Corp.*, No. 24-14727 (SLM) (Bankr. D.N.J. June 5, 2024) (authorizing a consolidated list of the debtors' thirty (30) largest unsecured creditors); *In re Thrasio Holdings, Inc.*, No. 24-11840 (CMG) (same); *In re Invitae Corp.*, No. 24-11362 (MBK) (same); *In re Caresmatic Brands, LLC,* No. 24-10561 (VFP) (Bankr D.N.J. Feb. 29, 2024) (same); *In re WeWork Inc.*, No. 23-19865 (JKS) (Bankr. D.N.J. Dec. 20, 2023) (same).

38. Accordingly, the Debtors submit that filing a Top 30 List and a Consolidated Creditor Matrix is necessary for the efficient and orderly administration of these Chapter 11 Cases, appropriate under the facts and circumstances, and in the best interests of the Debtors' estates.

WAIVER OF MEMORANDUM OF LAW

39. The Debtors respectfully request that the Court waive the requirement to file a separate memorandum of law pursuant to Rule 9013-1(a)(3) of the Local Rules because the legal basis upon which the Debtors rely is set forth herein and the Motion does not raise any novel issues of law.

RESERVATION OF RIGHTS

40. Nothing contained in this Motion or any order granting the relief requested in this Motion, and no action taken pursuant to the relief requested or granted (including any payment made in accordance with any such order), is intended as or shall be construed or deemed to be: (a) an admission as to the amount of, basis for, or validity of any claim against 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 claim on any grounds; (c) a promise or requirement to pay

any particular claim; (d) an implication, admission, or finding that any particular claim is an administrative expense claim, other priority claim or otherwise of a type specified or defined in this Motion or any order granting the relief requested by this Motion; (e) a request or authorization to assume, adopt, 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; or (g) a waiver or limitation of any claims, causes of action, or other rights of the Debtors or any other party in interest against any person or entity under the Bankruptcy Code or any other applicable law.

NO PRIOR REQUEST

41. No prior request for the relief sought in this Motion has been made to this or any other court.

NOTICE

42. Pursuant to Local Rule 9013-5(f), notice of this Motion will be provided to the following parties: (i) the Office of the United States Trustee for the District of New Jersey; (ii) any statutory committee appointed in these Cases; (iii) counsel for the Stalking Horse Purchasers; (iv) Debtors' consolidated list of 30 largest unsecured creditors; (v) the Internal Revenue Service; (vi) the United States Attorney's Office for the District of New Jersey; and (viii); any other party entitled to notice pursuant to Bankruptcy Rule 2002. As this Motion is seeking "first day" relief, within 48 hours of the entry of the Interim Order on this Motion, the Debtors will serve copies of the Interim Order, as required by Local Rule 9013- 5(f). The Debtors submit that such notice is sufficient, and no other or further notice be provided.

CONCLUSION

WHEREFORE, the Debtors respectfully request that the Court enter an order in substantially the form submitted herewith: (i) designating these Cases as complex chapter 11 cases; (ii) approving and implementing the Case Management Procedures; (iii) authorizing service to certain parties via email and text message/SMS; (iv) authorizing, but not directing, the Debtors to (a) file a consolidated list of the Debtors' fifty (50) largest unsecured creditors in lieu of filing separate creditor lists for each Debtor, and (b) file a consolidated list of creditors in lieu of submitting a separate mailing matrix for each Debtor; and (v) granting such other and further relief as the Court deems just and proper.

Dated: July 22, 2026

ARCHER & GREINER, P.C.

/s/ Stephen M. Packman

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Proposed Counsel to the Debtors

[5] *Pro Hac Vice* admission pending.

EXHIBIT "A"

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Proposed Attorneys for Debtors

In re: POOLIN TECHNOLOGY PTE. LTD., *et al.*,[1] Debtors.	Case No. 26-18325 Chapter 11 (Joint Administration Requested)

ORDER (I) DESIGNATING COMPLEX CHAPTER 11 CASES; (II) ESTABLISHING CERTAIN NOTICE, CASE MANAGEMENT, AND ADMINISTRATIVE PROCEDURES; (III) AUTHORIZING SERVICE TO CERTAIN PARTIES BY EMAIL AND SMS/TEXT MESSAGE; AND (IV) GRANTING RELATED RELIEF

The relief set forth on the following pages, numbered two (2) through seven (7), is **ORDERED**.

[1] The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtors' federal tax identification number, are: Poolin Technology PTE. Ltd., a Singapore Private Limited Company; Lonestar Dream Inc. (5105); and Lonestar Taproot LLC (4118). The location of the Debtors' service address for purposes of these Chapter 11 Cases is: c/o Michael DuFrayne, CRO, 2564 US Highway 1, PMB #16884166, Lawrence, NJ 08648.

Upon consideration of the motion (the "Motion")[1] of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order (this "Order") (i) designating these Cases as complex Chapter 11 Cases; (ii) approving and implementing Case Management Procedures; (iii) authorizing service to certain parties via email and text message/SMS; and (iv) granting such other and further relief as more fully set forth in the Motion; and upon the *Declaration of Michael DuFrayne in Support of Debtors' Chapter 11 Petitions and First Day Motions* [ECF No. 2] (the "First Day Declaration"); and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order Of Reference From The United States District Court For The District Of New Jersey* dated as of September 18, 2012; and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having found that the Debtors' notice of the Motion and opportunity for hearing on the Motion were appropriate and that no other notice need be provided under the circumstances; and this Court having determined that the legal and factual bases set forth in the Motion and at the hearing thereon establish just cause for the relief granted herein; and upon all of the proceedings before this Court; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT**:

[1] Capitalized terms used but not otherwise defined herein have the meaning ascribed to them in the Motion.

Debtors: Poolin Technology Pte. Ltd., *et al.*
Case No. 26-18325
Caption of Order: Order (I) Designating Complex Chapter 11 Cases; (II) Establishing Certain Notice, Case Management, and Administrative Procedures; (III) Authorizing Service to Certain Parties by Email and Sms/Text Message; and (IV) Granting Related Relief

1. The Motion is **GRANTED** as set forth herein.

2. The Court concludes that the above-captioned cases constitute complex Chapter 11 Cases and are hereby designated as Complex Chapter 11 Cases pursuant to Local Rule 1002-2 and the General Order. The requirement under Local Rule 1002-2(b) that the Debtors file the local-form Application for Designation as a Chapter 11 Complex Case is waived.

3. The Debtors are authorized, but not directed, pursuant to section 105(a) of the Bankruptcy Code, Bankruptcy Rule 1007(d), and Local Rule 1007-1 to submit a Consolidated Creditor Matrix; provided that if any of these Chapter 11 Cases convert to a case under chapter 7 of the Bankruptcy Code, each applicable Debtor shall file its own creditor mailing matrix within fourteen (14) calendar days of any such conversion.

4. The Debtors are authorized to submit a single consolidated list of their thirty (30) largest unsecured creditors in lieu of a separate list for each Debtor.

5. The Case Management Procedures set forth in **Exhibit 1** hereto are approved and shall apply as provided therein in these Chapter 11 Cases, except as otherwise ordered by the Court. Notice and service accomplished in accordance with the Case Management Procedures, including service via electronic mail and text message/SMS (where permitted), shall be deemed adequate in all respects pursuant to the Bankruptcy Code, the Bankruptcy Rules, and the Bankruptcy Local Rules.

6. Except as otherwise ordered by the Court, the service requirements of Bankruptcy Rule 2002(g) are hereby modified to permit service by email and SMS/text message in accordance with the Case Management Procedures on parties that: (a) have not designated a mailing address

under Bankruptcy Rule 2002(g)(1) or Bankruptcy Rule 5003(e), and (b) do not request to be served hard copies by mail and such service shall be deemed adequate in all respects pursuant to the Bankruptcy Code, the Bankruptcy Rules, and the Bankruptcy Local Rules.

7. Any party in interest that receives service solely by electronic mail or text message/SMS may elect to receive service by mail by filing a notice of appearance pursuant to section 1109(b) of the Bankruptcy Code and Bankruptcy Rule 2002 and designating an address at which service may be effectuated.

8. Any creditor or party in interest may elect not to receive non-core notices by submitting an inquiry requesting to opt-out to either the Debtors' claims and noticing agent at https://www.veritaglobal.net/Poolin/inquiry or by email to the Debtors' counsel: Stephen M. Packman, Esq., ARCHER & GREINER, P.C. (spackman@archerlaw.com), and/or Alexander J. Andrews, Esq., ARCHER & GREINER, P.C. (aandrews@archerlaw.com); such opt-out shall be effective upon receipt and shall apply prospectively. Notwithstanding any opt-out election, the Debtors shall continue to serve all creditors and parties in interest with materials implicating due process, including, without limitation, any bar date notices, plan and disclosure statement, solicitation packages, ballots, voting instructions, notices of disclosure statement and confirmation hearings, and related deadlines, and any other documents that the Court may direct be served notwithstanding an opt-out election.

9. The next three omnibus hearings are scheduled as follows:

a. [: _.m.], prevailing Eastern Time, on [OMNIBUS HEARING DATE 1];

b. [: _.m.], prevailing Eastern Time, on [OMNIBUS HEARING DATE 2]; and

c. [: _.m.], prevailing Eastern Time, on [OMNIBUS HEARING DATE 3].

10. The Debtors are authorized to make non-substantive revisions and corrections as needed to the Case Management Procedures, including filling in (a) the omnibus hearing schedule, and (b) the date and docket number of this Order.

11. Nothing in this Order or the Case Management Procedures shall alter or supersede the relief sought or granted in the *Debtors' Motion for Entry of an Order (I) Authorizing Redaction of Certain Personally Identifiable Information of Natural Persons, and (II) Granting Related Relief* (the "PII Redaction Motion"), and any service list, creditor list, or mailing matrix contemplated by the Case Management Procedures may be filed and maintained in redacted form consistent with, and solely to the extent authorized by, an order granting the PII Redaction Motion.

12. Any party may obtain a copy of the Case Management Procedures by: (a) accessing the website maintained by the Debtors' claims and noticing agent at https://www.veritaglobal.net/Poolin, free of charge; (b) contacting the Debtors' claims and noticing agent directly by submitting an inquiry at https://www.veritaglobal.net/Poolin/inquiry or by telephone at (877) 634-7165 (U.S./Canada) or (424) 236-7221 (International); or (c) by accessing PACER on the Court's website at https://www.njb.uscourts.gov for a nominal fee.

13. As soon as reasonably practicable after the entry of this Order, a copy of the Case Management Procedures shall be served by the Debtors on each of the parties on the Master Service List (as defined in the Case Management Procedures attached as **Exhibit 1** hereto). The Debtors' claims and noticing agent shall post the Case Management Procedures on the Case Website (as defined in the Case Management Procedures).

14. If the Debtors seek to modify the Case Management Procedures during these Chapter 11 Cases, the Debtors shall (a) provide five (5) days' notice to the Office of the United States Trustee for the District of New Jersey (the "U.S. Trustee") and any statutory committee appointed in these Chapter 11 Cases prior to modifying the Case Management Procedures, and (b) if there are no objections, the Debtors shall (i) make updated versions of the Case Management Procedures available on the Case Website, (ii) file a notice of the updated procedures (along with a copy of the updated procedures) electronically on the docket, and (iii) serve such updated procedures in accordance with the revised Case Management Procedures.

15. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be deemed: (a) an admission as to the validity of any claim against the Debtors; (b) a waiver of the Debtors' rights to dispute any claim on any grounds; (c) a promise or requirement to pay any claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order or the Motion; (e) a request or authorization to assume any agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; (f) a waiver or limitation of the Debtors' rights under the Bankruptcy Code or any other applicable law; or (g) a concession by the Debtors that any liens (contractual, common law, statutory, or otherwise) satisfied pursuant to the Motion are valid, and the Debtors expressly reserve their rights with respect to all of the foregoing.

16. Nothing in this Order, the Motion, or any actions taken pursuant hereto is intended to or shall (a) confer upon any third party any rights or remedies whatsoever, (b) grant any party the status of a third-party beneficiary, (c) be enforceable by any third party, or (d) enhance the

status of any claim held by any person or entity. Nothing herein shall be deemed to convert the priority of any claim from a prepetition claim into an administrative expense claim.

17. Nothing in this Order or any action taken by the Debtors in furtherance of the implementation hereof shall be deemed to constitute an assumption or rejection of any executory contract or unexpired lease pursuant to section 365 of the Bankruptcy Code, and all of the Debtors' rights with respect to such matters are expressly reserved.

18. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion under the circumstances, and the requirements of Bankruptcy Rule 6004(a) and the Bankruptcy Local Rules are satisfied by such notice.

19. The requirement set forth in Local Bankruptcy Rule 9013-1(a)(3) that any motion be accompanied by a memorandum of law is hereby deemed satisfied by the contents of the Motion or otherwise waived.

20. To the extent applicable, the requirements set forth by Bankruptcy Rules 6003 and 6004 are satisfied, and this Order shall be effective immediately upon entry.

21. Notwithstanding any Bankruptcy Rule to the contrary, the terms and conditions of this Order are immediately effective and enforceable upon entry.

22. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

23. Any party may move for modification of this Order in accordance with Local Rule 9013-5(e).

24. The Debtors shall serve by regular mail a copy of this Order and the Motion on all parties required to receive such service pursuant to Bankruptcy Local Rule 9013-5(f) within two (2) business days after the entry of this Order.

25. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Exhibit 1

(Case Management Procedures)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Proposed Attorneys for Debtors

In re: POOLIN TECHNOLOGY PTE. LTD., *et al.*,[1] Debtors.	Case No. 26-18325 Chapter 11 (Joint Administration Requested)

NOTICE, CASE MANAGEMENT, AND ADMINISTRATIVE PROCEDURES

On July 22, 2026 (the "Petition Date"), each of the above-captioned debtors and debtors in possession (the "Debtors") commenced with this Court a voluntary case under chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code"). The Debtors are authorized to continue to manage their assets as debtors in possession pursuant to sections 1107(a) and 1108 of the

[1] The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtors' federal tax identification number, are: Poolin Technology Pte. Ltd., a Singapore Private Limited Company; Lonestar Dream Inc. (5105); and Lonestar Taproot LLC (4118). The location of the Debtors' service address for purposes of these Chapter 11 Cases is: c/o Michael DuFrayne, CRO, 2564 US Highway 1, PMB #16884166, Lawrence, NJ 08648.

Bankruptcy Code. No trustee, examiner, or statutory committee of creditors has been appointed in these Chapter 11 Cases.

On [DATE], 2026, the Court entered an order (the "Case Management Order"), pursuant to sections 102, 105(a), 107(c), and 521 of the Bankruptcy Code, rules 1001, 1007, 2002, 9007, 9013, 9014, and 9036 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and rules 1002-2, 1007-1, 9013-1, and 9013-5 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the "Bankruptcy Local Rules"), approving (a) these Notice, Case Management, and Administrative Procedures (collectively, the "Case Management Procedures"), and (b) the form and notice thereof.

Pursuant to the Case Management Order, all notices, motions, applications, briefs, memoranda, declarations, affidavits, objections, responses, replies, supporting documents, and other papers filed in these Chapter 11 Cases, including with regard to any contested matters and any related adversary proceedings, and orders entered in these Chapter 11 Cases, including with regard to any contested matters and any related adversary proceedings, are subject to, and will not be deemed properly served unless they are served in accordance with, these Case Management Procedures.

Accordingly, all parties in interest are strongly encouraged to review the below Case Management Procedures in their entirety and consult their own legal counsel with respect to any of the matters discussed herein prior to filing any documents in the Chapter 11 Cases.

Case Management Procedures

A. Omnibus Hearings

1. All Matters to Be Heard at Omnibus Hearings. All matters requiring a hearing in these Chapter 11 Cases, including with regard to any contested matters and any related adversary proceedings, shall be heard at periodic omnibus hearings (each, an "Omnibus Hearing"), in

accordance with these Case Management Procedures, unless otherwise ordered by the Court for good cause shown. The Debtors shall be authorized to schedule, in cooperation with the Court, Omnibus Hearings to consider: (a) all motions, applications, and other requests for relief, along with any notices, briefs, memoranda, declarations, affidavits, replies, and other documents filed in support of such papers seeking relief (collectively, the "Requests for Relief"); and (b) all objections and responses to such Requests for Relief and documents filed in support of such objections and responses (collectively, the "Objections" and, together with the Requests for Relief and all other filed documents, the "Court Filings") pursuant to the following procedures:

a) Initial Omnibus Hearings: The next three Omnibus Hearings shall be held on the following dates and times:

i. [**:** _.m.], prevailing Eastern Time, on [OMNIBUS HEARING DATE 1];

ii. [: _.m.], prevailing Eastern Time, on [OMNIBUS HEARING DATE 2]; and

iii. [: _.m.], prevailing Eastern Time, on [OMNIBUS HEARING DATE 3].

b) Subsequent Omnibus Hearings. The Debtors shall be authorized to schedule, in coordination with the Court, additional Omnibus Hearings. The Debtors shall file notices of additional Omnibus Hearing dates with the Court on a periodic basis. The Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global (the "Claims and Noticing Agent" or "Verita"), shall post the dates of the Omnibus Hearings on a website established for this case at https://www.veritaglobal.net/Poolin (the "Case Website"). Entities may contact the Claims and Noticing Agent for information concerning all scheduled Omnibus Hearings.

c) Proposed Notice of Agenda. Before noon (prevailing Eastern Time) on the day that is two (2) business days before each Omnibus Hearing, the Debtors' counsel will file a proposed Notice of Agenda with regard to the matters that are scheduled to be heard at such Omnibus Hearing (the "Notice of Agenda"). The Notice of Agenda may include notice of matters that have been consensually adjourned to a later Omnibus Hearing in lieu of parties filing a separate notice of such adjournment.

d) Content of Notice of Agenda. The proposed Notice of Agenda shall list: (i) the docket number (in docketing order) and title of each matter scheduled for hearing at such Omnibus Hearing, including the initial filing and any filed responses, replies, or documents related thereto; (ii) the relevant objection deadlines and whether the matters are contested or uncontested; (iii) whether the matters have settled or are proposed to be continued; and (iv) other comments that will assist the Court. The matters listed on the proposed Notice

of Agenda shall be limited to matters of substance and shall not include administrative filings, such as notices of appearance and affidavits of service. Resolved or continued matters shall be listed ahead of unresolved matters on the Notice of Agenda. Contested matters shall be listed in the order of docketing with the corresponding docket number.

All amended Notices shall list matters as listed in the original Notice of Agenda with all edits and additional information being listed in boldface type.

Copies of the Notice of Agenda shall be served upon all counsel who have entered an appearance in the case, as well as all other counsel with a direct interest in any matter on the Notice of Agenda and the United States Trustee simultaneously with the filing of the Notice of Agenda with the Court.

If and when an adversary proceeding is scheduled, the Notice of Agenda shall indicate the adversary proceeding number and the corresponding docket number for pleadings filed in the adversary proceeding on the Notice of Agenda, in addition to the information regularly required in a Notice of Agenda.

e) Adjournment of Omnibus Hearings. Unless the Court orders otherwise, the Debtors' counsel may, without further leave of the Court: (i) adjourn any hearing on a Request for Relief filed by the Debtors to a subsequent Omnibus Hearing either (A) if no Objection contesting the relief has been filed, or (B) with the consent of any party that has filed such an Objection; and (ii) adjourn any hearing on a Request for Relief filed by a non-Debtor party to a subsequent Omnibus Hearing provided that the filing party consents and either (A) no Objection contesting the relief has been filed, or (B) any party that has filed such an Objection consents. Notice of such adjournments may be filed separately on the docket or noted in the Proposed Hearing Agenda.

f) Cancellation of Omnibus Hearings. If no matters are scheduled for hearing at an Omnibus Hearing, the Debtors may cancel the Omnibus Hearing, with the consent of the Court, by filing a notice of cancellation on the docket for these Chapter 11 Cases.

g) No Omnibus Hearing Currently Scheduled. If, at any time, no Omnibus Hearing is scheduled on the docket, or no Omnibus Hearing is scheduled to occur within the notice period applicable to a Request for Relief that a party wishes to file (in each case, a "Scheduling Gap"), the Debtors shall, in cooperation with the Court, promptly schedule one or more additional Omnibus Hearings, file a notice of the scheduled date(s) and time(s) on the docket, and cause the Claims and Noticing Agent to post the date(s) and time(s) on the Case Website. During a Scheduling Gap, a party that wishes to file a Request for Relief may (i) submit a written request (email to Debtors' counsel being sufficient) that the Debtors schedule an Omnibus Hearing, in which event Debtors' counsel shall coordinate with the Court to obtain a date within three (3) business days of such request, or (ii) contact the chambers of the presiding judge or the Clerk of Court to obtain a hearing date in accordance with the Court's procedures. Any Request for Relief filed during a Scheduling Gap shall be deemed scheduled for, and shall be heard at, the first Omnibus Hearing thereafter scheduled that is consistent with the twenty-one (21) day notice requirement unless (A) the Court orders otherwise, (B) the matter proceeds by Negative Notice, or (C)

the party proceeds on shortened notice or an expedited basis. A Scheduling Gap shall not shorten, extend, or otherwise alter any applicable Objection Deadline or Reply Deadline, each of which shall be calculated from the hearing date ultimately scheduled.

B. Filing Procedures; General Motion Practice; Deadlines for Filing of Responsive Pleadings

1. Procedures Established for Court Filings. Registered users of the Court's Electronic Case Filing System (the "ECF System") shall file all Court Filings electronically. Any Court Filing that refers specifically to a pleading that has already been filed in the Chapter 11 Cases shall make specific reference to the docket number assigned by the Court to such pleading by use of the designation "Docket No. ___" or similar designation.

2. General Motion Practice. The following procedures shall be followed for Requests for Relief generally, except as otherwise provided by these Case Management Procedures or an order of the Court:

a) Requests for Relief. Any Request for Relief, including briefs, must be filed at least twenty-one (21) calendar days prior to the hearing thereon. A Request for Relief may be scheduled by the filing party to be heard at any Omnibus Hearing at least twenty-one (21) calendar days after the filing of such Request for Relief.

b) Inconsistent Filings. If a party other than the Debtors files a Court Filing and purports to set a hearing date inconsistent with these Case Management Procedures (an "Inconsistent Filing"), the hearing shall be scheduled, without the necessity of Court order, for the first Omnibus Hearing date after the 21-day notice period has expired, and the Debtors shall provide such party with notice of these Case Management Procedures within three (3) business days of receipt of the Inconsistent Filing. If such filing is filed at least twenty-one (21) days from the next Omnibus Hearing Date, then the hearing with respect to such filing shall be deemed to be on such omnibus hearing date. If such filing is less than twenty-one (21) days prior to the next omnibus hearing date, then the hearing with respect to such filing shall be the next omnibus hearing date after the required twenty-one (21) days have passed. The movant must provide notice of the corrected hearing date to all affected parties and thereafter file a certificate of service regarding the notice.

c) Service of Requests for Relief. All Requests for Relief shall be served in accordance with the Bankruptcy Rules, the Bankruptcy Local Rules, and any applicable Court order on: (i) the parties identified on the core service list (the "Core Service List"), as set forth herein; (ii) the entities that have filed a request for service pursuant to Bankruptcy Rule 2002 (a "2002 Notice Request") (the "2002 List," and, together with the Core Service List,

the "Master Service List"); and (iii) each entity with a particularized interest in the subject matter of the specific Court Filing (each, an "Affected Entity").

d) Notices of Requests for Relief. Parties should consult the Bankruptcy Local Rules regarding the form and content of notices with respect to Requests for Relief and visit the Court's website at http://njb.uscourts.gov for more information.

e) Requests for Shortened Time or Limited Notice. Nothing contained herein shall prejudice the rights of any party in interest to move the Court to further limit or expand notice of matters and proceedings upon a showing of good cause, including, but not limited to, the right to (i) file a Request for Relief upon shortened notice, or (ii) seek an enlargement or reduction of time pursuant to Bankruptcy Rule 9006.

f) Expedited Hearings. If a party in interest has an emergency or other situation that it believes requires consideration on less than the 21-day notice as required by D.N.J. LBR 9013-2(c), the moving party should file and serve a separate written application requesting shortened time and expedited hearing in respect of the underlying motion in the form provided at D.N.J. LBR 9013-2(c).

If the Court grants the motion for expedited hearing, the underlying motion will be set at the next available omnibus hearing date or at some other appropriate shortened date approved by the Court.

Requests for expedited hearings will only be granted under emergency or exigent circumstances.

g) Negative Noticing Procedures. Subject to the Court's discretion, the Court may approve notice procedures which provide that if no objections are timely filed and served by a deadline set in accordance with the Bankruptcy Rules and/or the Case Management Order and/or the Bankruptcy Local Rules, the Court may enter an order granting the relief requested without further notice or a hearing ("Negative Notice"). The notice of motion accompanying such motion must specifically advise parties of the objection deadline and must also inform the recipient that if no objections are filed and served, the Court may enter an order granting the motion without further notice or hearing. If an objection is timely filed and served, a hearing will be scheduled for the next Omnibus Hearing date unless otherwise ordered by the Court.

h) Evidentiary Hearings. Nothing herein shall prejudice the rights of any party to seek appropriate discovery with respect to any Court Filings, and all parties' rights to request an evidentiary hearing or establish a discovery schedule are preserved. Parties who intend to offer evidence at any hearing must file a witness and exhibit list at least 48 hours before the scheduled hearing unless otherwise ordered by the Court or by agreement of the parties.

i) Certificate of No Objection. After the Objection date has passed with no Objection having been filed or served, counsel for the movant may file a Certification of No Objection substantially in the form as it appears in the General Order Governing Procedures for Complex Chapter 11 Cases on the annexed Schedule "1" stating that no Objection has been filed or served on the movant.

By filing such certifications, counsel for the movant is representing to the Court that the movant is unaware of any objection to the motion or application and that counsel has reviewed the Court's docket and no Objection appears thereon.

Upon receipt of the Certification of No Objection, the Court may enter the order accompanying the motion or application without further pleading or hearing and, once the order is entered, the hearing scheduled on the motion or application shall be cancelled without further notice.

3. Filing and Service of Objections, Replies, and Other Responsive Pleadings. The following procedures shall be followed, except as otherwise provided by these Case Management Procedures or an order of the Court:

a) Objections and Replies**.** Any Objection, including related briefs, must be filed on or before the date that is seven (7) days prior to the hearing set on the motion unless otherwise provided by the Court (the "Objection Deadline"). If an objection is filed, the movant or another interested party may file a reply and any documents in support of the reply, including briefs (collectively, a "Reply"), with the Court on or before four (4) days before the applicable hearing date unless otherwise provided by the Court (the "Reply Deadline").

b) Extension of Objection Deadline. The Objection Deadline and Reply Deadline may be extended upon the consent of the entity filing the Request for Relief or Objection without further order of the Court. Unless otherwise agreed by the entity filing the Request for Relief, adjournment of the hearing on the Request for Relief shall not extend the Objection Deadline.

c) Service of Objections. All Objections shall be filed with the Court and served by the applicable Objection Deadline upon (i) the entity filing the Request for Relief, (ii) the Debtors, (iii) those entities on the Core Service List, and (iv) each Affected Entity.

d) Service of Replies to Objections**.** Any Reply shall be filed and served by the applicable Reply Deadline upon (i) the entity filing the Request for Relief, (ii) the Debtors, (iii) each party that filed an Objection, (iv) each party on the Core Service List, and (v) each Affected Entity.

4. Granting the Request for Relief Without a Hearing. A Request for Relief may be granted without a hearing to the extent allowed under the Bankruptcy Rules or the Bankruptcy Local Rules, except as otherwise provided herein. If the Court decides not to grant the Request for Relief without a hearing, (a) the Request for Relief shall be heard at the next scheduled Omnibus Hearing, and (b) the decision not to grant the Request for Relief shall not constitute an extension

of the Objection Deadline related thereto with respect to any party, unless otherwise agreed between the party seeking relief and the party seeking to object.

C. Service and Notice Procedures

1. Procedures Established for Notices. All Court Filings shall be filed with the Court and served in accordance with the notice procedures set forth herein (the "Notice Procedures").

2. Entities Entitled to Service. All Court Filings shall be served on the Core Service List and any other Affected Entities according to the Notice Procedures, except as otherwise provided by these Case Management Procedures or an order of the Court. In accordance with Bankruptcy Rule 2002, the Claims and Noticing Agent shall maintain the Core Service List, which shall be updated in accordance with these Case Management Procedures. An updated Core Service List can be obtained by (a) accessing the Case Website, (b) contacting the Claims and Noticing Agent directly, or (c) contacting Debtors' counsel directly.

3. Maintenance of the Core Service List. At least every fourteen (14) days during the first sixty (60) days of these Chapter 11 Cases, and thereafter at least once every thirty (30) days, the Claims and Noticing Agent shall maintain and update the Core Service List by (a) making any necessary additions and deletions, and (b) posting an updated version of the Core Service List on the Case Website. The Debtors' counsel must file a Core Service List with the Court every time it is updated. Any Core Service List, Master Service List, creditor list, or mailing matrix filed with the Court may be filed in redacted form to the extent authorized by the Court.

4. Parties on the Core Service List. The Core Service List shall include the following parties:

a) the Debtors;

b) the Debtors' counsel;

c) the New Jersey office of the United States Trustee for Region 3;

d) counsel to the New Jersey office of the United States Trustee for Region 3

e) the chairperson(s) of any official committee(s) established pursuant to section 1102 of the Bankruptcy Code;

f) counsel retained by any official committees established pursuant to section 1102 of the Bankruptcy Code, or any counsel retained by the respective twenty (20) largest unsecured creditors of the Debtors if an official committee has not been appointed;

g) counsel to any secured creditors, to include but not be limited to counsel to any DIP Agent (if any); and

h) any other person or entity as authorized by the Court.

5. Master Service List. Debtors with the help of their Claims and Noticing Agent shall maintain and update the Master Service List, which shall be comprised of the Core Service List and the 2002 List. Service on the persons/entities listed on the Master Service List shall be made only with respect to those matters enumerated in the Case Management Order. Debtors' counsel must update the Master Service List at least every fourteen (14) days during the first sixty (60) days of these Chapter 11 Cases and at least once every thirty (30) days thereafter. Further, the Debtors' counsel must file a Master Service List with the Court each time it is updated. The Claims and Noticing Agent shall post an updated version of the Master Service List on the Case Website.

6. Requests for Documents. Any creditor or party in interest may enter an appearance and request receipt of all Court Filings pursuant to Bankruptcy Rule 2002 by filing a 2002 Notice Request with the Court and providing a copy of the 2002 Notice Request to (a) the Debtors and their counsel, and (b) the Claims and Noticing Agent. Except as set forth herein, a 2002 Notice Request filed with the Court shall be deemed proper only if it includes the following information with respect to the party filing such request: (a) the name, organization (if any), full street address (no P.O. boxes), phone number, fax number (if any), and email address (if any) of the party requesting service; (b) if made by an attorney, the party or parties that such attorney represents;

and (c) a certification that a copy of the 2002 Notice Request has been provided to the Debtors and their counsel and the Claims and Noticing Agent.

7. Certification Opting Out of Electronic Service. Any individual or entity filing a 2002 Notice Request who does not maintain (and cannot practicably obtain) an email address or mobile telephone number, and therefore cannot receive service by email or text message/SMS, must include in the 2002 Notice Request a certification to that effect (the "Certification"). The Certification shall include a statement certifying that the individual or entity (a) does not maintain an email address or mobile telephone number, and (b) cannot practicably obtain an email address or mobile telephone number at which the individual or entity could receive service by email or text message/SMS. Such individual or entity will thereafter receive paper service as provided in these Case Management Procedures.

8. No Email, Mobile Number, or Certification Provided. If a 2002 Notice Request fails to include an email address, a mobile telephone number, or a Certification, the Debtors shall forward a copy of these Case Management Procedures to such party within five (5) business days of receipt of service of the 2002 Notice Request and specifically request an email address, mobile telephone number, and/or Certification. ***Until (a) an email address or mobile telephone number, or (b) a Certification is provided in response to the Debtors' request, such party shall not be added to the 2002 List and shall not be served with copies of Court Filings filed in these Chapter 11 Cases unless such Court Filings directly affect such party.***

9. Service of Motions Required to Be Served on All Creditors and Parties in Interest. With respect to Requests for Relief for which particular notices are required to be served on all creditors and parties in interest, parties shall serve all such filings by electronic mail or text

message/SMS (where available), except as otherwise provided herein, on the Core Service List and any Affected Entity.

10. All notices required by subdivisions Bankruptcy Rules 2002(a)(2), 2002(a)(3), 2002(a)(6), and 4001 shall be served upon:

a) each entity designated on the Core Service List;

b) when the notice is of a proposed use, sale, lease, or abandonment of property or of a hearing thereon, each entity designated on the most recent Master Service List and each entity having an interest in the property;

c) when the notice relates to relief from the stay in order to take action against property of a Debtor's Estate, each entity having a lien, encumbrance or interest in the subject property;

d) when the notice relates to use of cash collateral or obtaining credit, each entity who has an interest in the cash collateral or each entity who has a lien or other interest in property on which a lien is proposed to be granted;

e) when the notice is of a proposed compromise or settlement or of a hearing thereon, each entity designated on the most recent Master Service List and each entity who is a party to the compromise or settlement; and

f) when the notice is of an application for compensation or reimbursement of expenses or of a hearing thereon, each entity designated on the most recent Master Service List and each professional person who is seeking compensation or reimbursement whose retention in these Chapter 11 Cases is authorized by the Court.

11. Service by Email and Text Message/SMS. All Court Filings shall be electronically filed using the ECF System and served via email or text message/SMS (where available) as provided in these Case Management Procedures, which shall be deemed to constitute proper service for all parties who are sent such service, provided, however, that notwithstanding the foregoing and anything to the contrary in these Case Management Procedures, (a) a summons and complaint in an adversary proceeding shall not be served by email or text message/SMS and shall be served in accordance with Bankruptcy Rule 7004, and (b) documents filed under seal shall not be served, subject to any protective orders entered in these Chapter 11 Cases and section 107(c)(3)

of the Bankruptcy Code. In accordance with Bankruptcy Rule 9036, the "Notice of Electronic Filing" that is automatically generated and sent via email by the ECF System shall constitute proper, sufficient, and effective service by email for those parties who are, or whose agents are, registered attorney users of the ECF System (collectively, the "ECF System Users"). Therefore, a party filing a Court Filing that is served on the ECF System Users via the ECF System has no further obligation to serve such Court Filing on the ECF System Users, provided that service to an ECF System User shall not be effective if the filing party receives notice that service of the Court Filing did not reach the ECF System User.

a) Tiered Service. For any party for whom the Debtors have a mailing address, the Debtors shall serve such party by mail or, as applicable, by email in accordance with these Case Management Procedures. For any party whose mailing address is unknown to the Debtors, the Debtors are authorized to effectuate service first by email, where an email address is available to the Debtors, and thereafter by text message/SMS if service by email is unsuccessful. Where service is made by text message/SMS, the text message shall identify these Chapter 11 Cases and the Court Filing being served and shall provide a means of accessing the complete Court Filing electronically, including a link to the Case Website or the relevant filing.

b) Election to Receive Service by Mail. Any party in interest that receives service solely by email or text message/SMS may elect to receive service by mail by filing a notice of appearance pursuant to section 1109(b) of the Bankruptcy Code and Bankruptcy Rule 2002 and designating an address at which service may be effectuated.

c) Consent to Electronic Service. Each creditor or party in interest that files a 2002 Notice Request shall be deemed to have consented to service of all Court Filings solely by electronic transmission (whether by email or text message/SMS), unless such creditor or party in interest has included a Certification opting out of such service.

d) Opt-Out from Non-Core Notices. Without the need to file anything on the docket or obtain further order of the Court, any creditor or party in interest may elect not to receive non-core notices by submitting an inquiry requesting such opt-out to the Claims and Noticing Agent at https://www.veritaglobal.net/Poolin/inquiry or by email to Debtors' counsel, Stephen M. Packman, Esq. (spackman@archerlaw.com) and/or Alexander J. Andrews, Esq. (aandrews@archerlaw.com). Any such opt-out shall be effective upon receipt and shall apply prospectively. Notwithstanding any opt-out election, the Debtors shall continue to serve all creditors and parties in interest with materials implicating due process, including, without limitation, any bar date notices, plan, disclosure statement, solicitation packages, ballots, voting instructions, notices of disclosure statement and

confirmation hearings and related deadlines, and any other documents that the Court directs be served notwithstanding an opt-out election.

e) Email Subject Line. With respect to the service of any Court Filing by email, the subject line of the email shall include: (i) the Debtors' lead case name and lead case number (*In re Poolin Technology Pte. Ltd.*, Case No. 26-18325); (ii) the name of the party serving such Court Filing; and (iii) the title of the Court Filing being served. If the title of the Court Filing is too long to fit reasonably within the subject line of the email, the subject line shall contain a shortened version of such title and the text of the email shall contain the full name of such Court Filing.

f) Email Attachments. All Court Filings served by email shall include access to a computer file containing the entire document (including any proposed form of order and exhibits, attachments or other materials) in PDF format, readable by Adobe Acrobat or other equivalent document reader programs commonly available without cost. The relevant Court Filing shall either be attached to the email in a format specified above or the email shall contain a link to such filing in such format.

g) Effective Date of Service. Service by email or text message/SMS on a party shall be effective as of the earlier of: (i) the date the Court Filing (or a notice stating that the Court Filing cannot be attached but is available on the ECF System or the Case Website) is transmitted by email or text message/SMS to the address or mobile telephone number provided by, or otherwise available to the Debtors for, such party; or (ii) the date the Court Filing is posted on the ECF System where service on such ECF System User via the ECF System is proper under these Case Management Procedures.

12. Certificates of Service. The certificate of service for each filing must be filed with the Court together with the complete Service List that was utilized and served for a particular filing, but said certificate of service is not to be served via hard copy on the recipients of the filing.

13. Service in Adversary Proceedings. All filings in adversary proceedings shall be served, pursuant to Bankruptcy Rule 7005, upon all parties to the adversary proceeding, all parties known to have a particularized interest in the subject of such adversary proceeding, and the parties listed on the Core Service List. Any summons, complaint, or motion initiating an adversary proceeding shall be served in hard copy format, pursuant to Bankruptcy Rule 7004, upon the party or parties against whom relief is sought, all parties known to have a particularized interest in the subject of such proceeding, and the parties listed on the Core Service List. Absent leave of the

Court, responsive pleadings shall be filed only by defendants in adversary proceedings and/or by parties in interest who seek to be joined or to dismiss for failure to join a necessary party.

14. Service of Orders. All parties submitting orders shall serve a confirmed copy of any entered order on the parties that were entitled to service of the underlying Request for Relief in accordance with these Case Management Procedures, except as otherwise provided by an order of the Court. The Claims and Noticing Agent shall post all entered orders on the Case Website.

15. Service Upon United States Trustee. Pursuant to the General Order Governing Procedures for Complex Chapter 11 Cases, the Office of the United States Trustee for Region 3—New Jersey Office requires service upon it of all pleadings and papers, including but not limited to, petitions, schedules, statements of financial affairs, plan, disclosure statement, and monthly operating reports, in hard copy format regardless of whether the United States Trustee's Office receives same electronically.

16. Right to Request Special Notice Procedures. Nothing herein shall prejudice the rights of any party in interest to seek an amendment or waiver of the provisions of the Case Management Procedures upon a showing of good cause, including, without limitation, the right to file a motion seeking emergency *ex parte* relief or relief upon shortened notice.

D. Additional Case Management Procedures

1. Adequate Notice. Notice and service accomplished in accordance with the provisions set forth in these Case Management Procedures shall be deemed adequate in all respects pursuant to the Bankruptcy Code, the Bankruptcy Rules, and the Bankruptcy Local Rules.

2. Computation of Time. Unless otherwise specified, all time periods referenced in these Case Management Procedures shall be calculated in accordance with Bankruptcy Rule 9006(a).

3. Extensions of Time**.** If a motion to extend the time for a party to take any action is filed consistent with these Case Management Procedures before the expiration of the period prescribed by the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, or the provisions of any order entered by this Court, the time shall automatically be extended until the Court acts on the motion, without the necessity for the entry of a bridge order. For the avoidance of doubt, an automatic extension under these Case Management Procedures does not require the issuance or entry of an order extending time. If the Court denies such motion to extend, then the applicable action must be completed no later than 5:00 p.m., prevailing Eastern Time, on the first business day after the Court enters such order.

4. Effect of the Case Management Procedures. The Bankruptcy Rules and the Bankruptcy Local Rules shall continue to apply to all proceedings in these Chapter 11 Cases, except to the extent that any provision of these Case Management Procedures by its terms supersedes or is inconsistent with such rules.

5. Modification of Order. Any party may at any time apply for reconsideration or modification of the Order approving these Case Management Procedures. Service of said motion shall be made to all persons/entities on the Master Service List. The Court may amend Case Management Procedures from time to time as is necessary.