Docket #0006 Date Filed: 7/22/2026

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

DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING REDACTION OF CERTAIN PERSONALLY IDENTIFIABLE INFORMATION OF NATURAL PERSONS; AND (II) GRANTING RELATED RELIEF

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

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

[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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"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) authorizing redaction of certain personally identifiable information of natural persons; and (ii) 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 statutory predicate for the relief requested herein is 11 U.S.C. §§ 105(a), 107(c), and 521 of Title 11 of the United States Code (the "Bankruptcy Code"), Bankruptcy Rules 1007, 9018, and 9037, and Rules 1007-1 of the Local Bankruptcy Rules for the District of New Jersey (the "Local Rules").

BACKGROUND

4. 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.

5. 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

6. The Debtors seek entry of the Proposed Order substantially in the form attached hereto: (i) authorizing redaction of certain personally identifiable information of natural persons; and (ii) granting related relief.

BASIS FOR RELIEF REQUESTED

7. Section 107(c) of the Bankruptcy Code provide that the Court:

> [F]or cause, may protect an individual, with respect to the following types of information to the extent the court finds that disclosure of such information would create undue risk of identity theft or other unlawful injury to the individual or the individual's property:
>
> (A) Any means of identification . . . contained in a paper filed, or to be filed in a case under [the Bankruptcy Code].
>
> (B) Other information contained in a paper described in subparagraph (A).

11 U.S.C. § 107(c)(1). Furthermore, Bankruptcy Rule 9037(a) authorizes the Debtors to redact certain personally identifiable information of minors. *See* Fed. R. Bankr. P. 9037(a). Likewise, section 1028(d)(7)(A) of title 18 of the United States Code defines "means of identification" as:

> any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual, including any—(A) name, social security number, date of birth, official State or government issued driver's license or identification number, alien registration number, government passport number, employer or taxpayer identification number . . . .

18 U.S.C. § 1028(d)(7)(A). Thus, if a debtor can show that disclosure of any "means of identification," or some "other information," creates "undue risk of identity theft" or "other unlawful injury," courts may intervene to curtail disclosure of that information. 11 U.S.C. § 107(c)(1)(A)–(B).

8. Although personal addresses are not specifically enumerated in the definition of "means of identification," the definition's list is inclusive, rather than exclusive, and should not be read as an exhaustive list of "means of identification." *See, e.g.*, *In re THG Holdings LLC*, No. 19-11689 (JTD) (Bankr. D. Del. Aug. 22, 2019) [Docket No. 180 at 37:25–38:5] (statement of Dorsey, J.) ("And in terms of 1028(d) not including address[es], I agree. I think that's an inclusive list. It wouldn't seem to make much sense that I could order the names not to be disclosed, but the addresses had to be; that wouldn't make any sense to me."); *In re L.K. Bennett U.S.A., Inc.*, No. 19-10760 (KG) (Bankr. D. Del. Apr. 9, 2019) [Docket No. 58 at 17:15–17] (statement of Gross, J.) ("I do think that the list of matters to be considered personally identifiable is not exclusive . . . ."). Accordingly, the fact that personal addresses are not listed in section 1028(d)(7)(A) of title 18 of the United States Code does not prohibit their redaction in bankruptcy court documents pursuant to section 107(c) of the Bankruptcy Code.

9. The Debtors request authority, pursuant to section 107(c) of the Bankruptcy Code, to redact (i) the home, e-mail addresses, phone numbers, and any other personally identifiable information, not including names of Debtors' employees, and (ii) the names, home addresses, and email addresses, and phone numbers of natural persons that the Debtors identified as being creditors of the Debtors, as known to the Debtors, unless such names have already been made

public in litigation with the Debtors, from any paper filed with the Court in these Chapter 11 Cases, including without limitation, the Debtors' creditor matrices, schedules of assets and liabilities, the schedules of executory contracts and unexpired leases, service lists, and statements of financial affairs (collectively, the "Schedules and Statements") and any affidavits of service related to any of the foregoing because such information may otherwise be used to perpetrate identity theft[2] and phishing scams, or to locate survivors of domestic violence, harassment, or stalking.

10. Redaction in cases such as these is necessary to protect personally identifiable information that may create "undue risk of identity theft or other unlawful injury to the individual or the individual's property." 11 U.S.C. § 107(c)(1). The risk in relation to 11 U.S.C. § 107(c)(1) is not merely speculative. In at least one chapter 11 case in Delaware, the abusive former partner of a debtor's employee used the publicly accessible information included in the debtor's chapter 11 case to track down the employee at her new address that had not previously been publicly available, forcing the employee to change addresses again.[3] Additionally, in a chapter 11 case in the Southern District of New York, at least nine phishing scams have been uncovered, including where scammers posed as the debtor's counsel or claims agent, using fake email accounts, and

[2] *See In re Endo Int'l. PLC*, No. 22-22549 (JLG), 2022 WL 16640880 at *7, 10- 12 (Bankr. S.D.N.Y. Nov. 2, 2022) (taking "judicial notice of the fact that identity theft is a world-wide problem," recognizing that the right of public access to judicial records "is not absolute," and authorizing the debtors to redact the names, home addresses, and email addresses of certain litigation claimants from any paper filed with that court and/or otherwise made publicly available by the debtors and the claims and noticing agent thereof); *see also In re Genesis Global Holdco, LLC*, 652 B.R. 618, 636-37 (Bankr. S.D.N.Y Aug. 4, 2023) (citing *Endo* and finding that "[h]ome addresses fall within that category of information, as it is taken as a 'given' that they constitute personally identifiable information that is vital information to perpetrators of identity theft, stalking and intimate partner violence alike, and that publishing such information facilitates an identity thief's search for data and a stalker's or abuser's ability to find his or her target" and that "an undue risk of identity theft of unlawful injury exists to the Individual [creditors] should their names, addresses, or other contact information be released in the bankruptcy cases. . . . redaction of the Individual [creditors] names is important because contact information—including home addresses—could easily be found on the internet through the use of their names.").

[3] The incident, which took place during the first *Charming Charlie* Chapter 11 proceedings in 2017, is described in the "Creditor Matrix Motion" filed in *In re Charming Charlie Holdings Inc.*, No. 19-11534 (CSS) (Bankr. D. Del. Jul. 11, 2019).

requested individual creditors' personal information. *See In re Celsius Network, LLC*, Case No. 22-10964 (MG) (Bankr. D. S.D.N.Y.) [Docket Nos. 1527, 1681, 1904, 1992, 2082, 2896, 3121, 3251, and 3422].

11. The Debtors propose to provide an unredacted version of the creditor matrices, service lists, Schedules and Statements, and any other redacted documents pursuant to the Interim Order and Final Order (as applicable) to: (a) the Court, (b) the U.S. Trustee, (c) counsel to any official committee appointed in these Cases, (d) Verita, the Debtors' proposed claims noticing and claims agent, and (e) any other party in interest, upon a request to the Debtors (email being sufficient), that is reasonably related to these Chapter 11 Cases, provided that any receiving party shall not transfer or otherwise provide such unredacted document to any person or entity not party to the applicable request; provided further, that any such request is subject to the Debtors' sole discretion, made on a case-by-case basis, regarding whether such disclosure could cause the Debtors to violate any obligation to which the Debtors may be subject including , among other things, the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other privacy or data protection law or regulation. Nothing requested herein or in the proposed Interim Order or Final Order is intended to preclude any party in interest's right to file a motion requesting that the Court unseal any redacted information. In addition, the Debtors will distribute, as applicable, any notices received at the Debtors' mailing address that are intended for a current employee to such employee.

12. In addition to granting the requested relief, bankruptcy courts within the Third Circuit have expounded on the importance of authorizing a debtor to redact individual creditors' personally identifiable information, including home addresses. In overruling an objection of the United States Trustee for the District of Delaware to the same relief proposed here, Chief Judge Sontchi noted that the proposed redaction was not a "burden of proof" issue so "much as a common

sense issue." Hr'g Tr. at 25:6–7, *In re Art Van Furniture, LLC*, No. 20-10533 (CSS) (Bankr. D. Del. Mar. 2020). Significantly, Judge Sontchi found that "at this point and given the risks associated with having any kind of private information out on the internet, [redaction] has really become routine [and] I think obvious relief." *Id.* at 25:13–16. Similarly, in *In re Clover Techs. Grp., LLC*, Judge Owens overruled the objection of the United States Trustee for the District of Delaware, noting that,

> [t]o me it is common sense. I don't need evidence that there is, at best, a risk of identity theft and worse a risk of personal injury from listing someone's name and address on the internet by way of the court's electronic case filing system and, of course, the claims agent's website. The court can completely avoid contributing to the risk by redacting the addresses. And while there is, of course, an important right of access we routinely redact sensitive and confidential information for corporate entities and redact individual's home addresses.

13. Hr'g Tr. at 24:21-25, 25:9-10, *In re Clover Techs. Grp., LLC*, No. 19-12680 (KBO) (Bankr. D. Del. Jan. 22, 2020).

14. Courts in this jurisdiction and within the Third Circuit commonly grant the relief requested herein in comparable Chapter 11 Cases. *See, e.g., In re New Rite Aid, LLC*, No. 25-14861 (MBK) (Bankr. D.N.J May 7, 2025) (authorizing the debtors to redact the names, home addresses, and email addresses of individual employees and individual customers listed on the creditor matrix, schedules and statements, affidavits of service, or other documents filed with the court); *see also In re Joann Inc.*, No. 25-10068 (CTG) (Bankr. D. Del. Feb. 10, 2025) (same); *In re Careismatic Brands, LLC*, No. 24-10561 (VFP) (Bankr. D.N.J. Jan. 24, 2024) (same); *In re PGX Holdings, Inc.*, No. 23-10719 (CTG) (Bankr. D. Del. July 19, 2023) (same); *In re SiO2 Medical Products, Inc.*, No. 23-10366 (JTD) (Bankr. D. Del. June 15, 2023) (same); *In re Cyxtera Technologies, Inc.*, No. 23-14853 (JKS) (Bankr. D.N.J. June 7, 2023 (same); *In re Rite Aid Corporation*, No. 23-18993 (MBK) (Bankr. D.N.J. Oct. 18, 2023) (same); *In re WeWork Inc.*, No.

23-19865 (JKS) (Bankr. D.N.J. Dec. 20, 2023) (same); *In re Bed, Bath & Beyond Inc.*, No. 23-13359 (VFP) (Bankr. D.N.J. May 17, 2023) (same); *In re David's Bridal, LLC*, No. 23-13131 (CMG) (Bankr. D.N.J. Apr. 19, 2023) (same); *In re Christopher & Banks Corp.*, No. 21-10269 (ABA) (Bankr. D.N.J. Jan. 15, 2021) (same); *In re SLT Holdco, Inc.*, No. 20-18368 (MBK) (Bankr. D.N.J. Jul. 30, 2020) (same); *In re AmeriMark Interactive, LLC*, No. 23-10438 (TMH) (Bankr. D. Del. Apr. 13, 2023) (same).

15. For these reasons, the Debtors respectfully submit that ample and just cause exists to authorize the Debtors to redact, pursuant to section 107(c)(1) of the Bankruptcy Code, the names, home addresses, and email addresses of individuals listed on any documents filed with this Court. Absent such relief, the Debtors run the risk of (a) unnecessarily rendering individuals more susceptible to identity theft and phishing scams, and (b) jeopardizing the safety of their employees, customers, and other individual creditors without any advance notice or opportunity to take protective measures.

WAIVER OF MEMORANDUM OF LAW

16. 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

17. 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

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

NOTICE

19. 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) the 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; (vii) the financial institutions at which the Debtors maintain the bank accounts identified herein; 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 the proposed orders in substantially the form submitted herewith, (i) authorizing redaction of certain personally identifiable information of natural persons; and (ii) and 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

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

ORDER AUTHORIZING REDACTION OF CERTAIN PERSONALLY IDENTIFIABLE INFORMATION OF NATURAL PERSONS; AND (II) GRANTING RELATED RELIEF

The relief set forth on the following pages, numbered two (2) through five (5), 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.

Debtors:	Poolin Technology Pte. Ltd., *et al.*
Case No.	26-18325
Caption of Order:	Order Authorizing Redaction of Certain Personally Identifiable Information of Natural Persons; and (II) Granting Related Relief

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) authorizing redaction of certain personally identifiable information of natural persons; and (ii) 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. The Motion is **GRANTED** as set forth herein.

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

2. The Debtors are authorized to redact in their creditor matrices, schedules and statements, and other documents or pleadings that the Debtors file with the Court in these Chapter 11 Cases the personal mailing address, email address, and other personally identifiable information of natural persons.

3. The Debtors shall provide an unredacted version of any other applicable redacted document to the U.S. Trustee, any trustee or official committee of unsecured creditors subsequently appointed in these Chapter 11 Cases, the Court, the Debtors' claims and noticing agent, and any party in interest, upon reasonable request to the Debtors (email being sufficient) that is reasonably related to these Chapter 11 Cases; *provided* that any such request is subject to the Debtors' sole discretion, made on a case-by-case basis, based on whether such disclosure could cause the Debtors to violate any obligation pursuant to, among other things, the Bankruptcy Code, Bankruptcy Rules, Local Rules, or any other applicable privacy or data protection law or regulation. Each party receiving an unredacted copy of the creditor matrices or any other applicable document shall keep such personally identifiable information confidential unless otherwise required to be disclosed by law or court order. The Debtors shall inform the U.S. Trustee promptly after denying any request for an unredacted document pursuant to this Order. Any party in interest that is not provided with an unredacted version of the applicable document upon request may file a motion with the Court to obtain such document. All parties' rights in this regard are reserved.

4. To the extent a party publicly files a document in these Chapter 11 Cases that is required to be served on parties whose information is under seal or redacted pursuant to this Order, such party in interest should contact counsel for the Debtors who shall work in good faith, with

the assistance of Verita (or other applicable claims and noticing agent), to effectuate the service on such party's behalf.

5. Nothing in this Order shall waive or otherwise limit the service of any document upon or the provision of any notice to any individual whose personally identifiable information is sealed or redacted pursuant to this Order. Service of all documents and notices upon individuals whose personally identifiable information is sealed or redacted pursuant to this Order shall be confirmed in the corresponding certificate of service.

6. 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.

7. 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.

8. 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.

9. Notice of the Motion, as provided therein, shall be deemed good and sufficient notice of the Motion, and the requirements of the Bankruptcy Rules and Local Rules are satisfied by such notice.

10. The requirement set forth in Bankruptcy Local 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.

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

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

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

14. The Debtors shall serve a copy of this Order on all parties required to receive such service pursuant to Local Rule 9013-5(f).

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