Docket #0094 Date Filed: 08/06/2026

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:

POOLIN TECHNOLOGY PTE. LTD., *et al.*,[1]

Debtors.

Case No. 26-18325 (EJO)

Chapter 11

(Jointly Administered)

Judge: Eamonn J. O'Hagan

DECLARATION OF MICHAEL DUFRAYNE IN SUPPORT OF DEBTORS' APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF MCCARN, WEIR, & SHERWOOD P.C. AS OIL, GAS, AND MINERAL COUNSEL EFFECTIVE AS OF THE PETITION DATE

Michael DuFrayne, being of full age, hereby declares the following pursuant to 28 U.S.C. § 1746 under penalty of perjury:

[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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1. I am the Chief Restructuring Officer ("CRO") of 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").

2. In connection with the Debtors' *Application for Entry of an Order Authorizing the Employment and Retention of McCarn, Weir, & Sherwood P.C. as Oil, Gas, and Mineral Counsel Effective as of the Petition Date* [Docket No. 24] (the "Application")[2] and the original Weir Declaration [Docket No. 24-2] annexed to the Application, I hereby submit this declaration (this "Declaration") in support of the Application.

3. I am over the age of 18 years and authorized to submit this Declaration on behalf of the Debtors. Except as otherwise noted, the matters set forth herein are made of my own personal knowledge and, if called and sworn as a witness, I could and would testify competently thereto.

4. These Chapter 11 Cases appear to be subject to the U.S. Trustee's *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013* (the "Guidelines").

5. In my capacity as CRO of the Debtors, I am the officer of the Debtors responsible for supervising the Debtors' outside counsel and for monitoring and controlling the Debtors' legal costs. The Debtors' CEO, COO and CFO also regularly review and monitor the Debtors' outside counsel and legal costs.

6. Based on representations of MWS and my personal experience with similar engagements, respectively, MWS's billing rates and material financial terms for this engagement

[2] Capitalized terms used but not defined herein have the meanings given to such terms in the Application.

are comparable to MWS's billing rates and terms for its other, non-bankruptcy engagements and to the billing rates and terms of other comparably skilled professionals.

7. In connection with the retention of mineral and title counsel, the Debtors considered but did not interview other firms.

8. The Debtors have established procedures to supervise fees and expenses and to manage legal costs for MWS which do not differ from the procedures the Debtors ordinarily employ outside of bankruptcy to supervise legal counsel. The Debtors, through the Chief Restructuring Officer, the Chief Operating Officer, and/or the Chief Financial Officer and President, ordinarily review counsel's bills, including the detailed time entries, to assess the reasonableness and necessity of the work performed, the time expended for work performed, and expenses incurred.

9. The Debtors have not undertaken efforts to negotiate MWS's rates, including rates for routine matters, or to delegate such matters to less expensive counsel, because the Debtors believe that MWS's rates are well within the acceptable and ordinary rates charged by comparably skilled professionals and are consistent with MWS's standard billing rates by its bankruptcy and non-bankruptcy professionals for other bankruptcy and non-bankruptcy related matters.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the above information is true and correct to the best of my knowledge, information, and belief.

Dated: August 6, 2026

/s/ Michael DuFrayne
Michael DuFrayne
Chief Restructuring Officer