UNITED STATES BANKRUPTCY COURT **DISTRICT OF NEW JERSEY**	
Caption in Compliance with D.N.J. LBR 9004-1(b) Bradford J. Sandler (N.J. Bar No. 009521996) Robert J. Feinstein (admitted *pro hac vice*) Shirley S. Cho (admitted *pro hac vice*) PACHULSKI STANG ZIEHL & JONES LLP 1700 Broadway, 36th Floor New York, NY 10019 Telephone: (212) 561-7700 Facsimile: (212) 561-7777 bsandler@pszjlaw.com rfeinstein@pszjlaw.com scho@pszjlaw.com *Proposed Counsel for the Official Committee of Unsecured Creditors*	
In re: POOLIN TECHNOLOGY PTE. LTD, *et al*., Debtors.[1]	Case No. 26-18325 (EJO) Chapter 11 (Jointly Administered) Judge: Eamonn J. O'Hagan

Hearing Date: Only if an objection is timely filed
Objection Deadline: August 31, 2026

APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ORDER, PURSUANT TO 11 U.S.C. §§ 328 AND 1103, FED. R. BANKR. P. 2014, AND LOCAL RULE 2014-1, AUTHORIZING AND APPROVING THE EMPLOYMENT AND RETENTION OF PACHULSKI STANG ZIEHL & JONES LLP AS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF AUGUST 13, 2026

TO THE HONORABLE EAMONN J. O'HAGAN, UNITED STATES BANKRUPTCY JUDGE FOR THE DISTRICT OF NEW JERSEY:

[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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The Official Committee of Unsecured Creditors (the "Committee") of the above-captioned debtors and debtors in possession (the "Debtors") hereby submits its application (the "Application") for the entry of an order authorizing and approving the employment of Pachulski Stang Ziehl & Jones LLP ("PSZ&J" or the "Firm") as counsel to the Committee in connection with the Debtors' chapter 11 cases (the "Cases"), effective as of August 13, 2026, pursuant to sections 328(a) and 1103(a) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rule 2014-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the "Local Rules"). In support of the relief sought in the Application, the Committee submits: (i) the Declaration of Bradford J. Sandler, a partner of the Firm (the "Sandler Declaration"), attached hereto as **Exhibit A** and incorporated herein by reference, and (ii) the declaration of Committee Chair Qi Su (the "Committee Chair Declaration," and together with the Sandler Declaration, the "Declarations") attached hereto as **Exhibit B** and incorporated herein by reference. In further support of the Application, the Committee respectfully states as follows:

Jurisdiction and Venue

1. The United States Bankruptcy Court for the District of New Jersey (the "Court") has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference of the Bankruptcy Court Under Title 11*, entered July 23, 1984, and amended on June 6, 2025 (Simandle, C.J.).

2. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

3. The Committee confirms its consent to the Court's entry of a final order in connection with this Application 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.

4. Venue of this proceeding and this Application is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

5. The statutory bases for the relief requested herein are sections 328 and 1103 of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1.

Background

6. On July 22, 2026 (the "Petition Date"), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors are operating their business and managing their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in these Cases.

7. On August 12, 2026, the United States Trustee for the District of New Jersey (the "U.S. Trustee") appointed an official committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code [Docket No. 112].

8. On August 13, 2026, the Committee voted to retain PSZ&J to serve as counsel to the Committee and on August 17, 2026, the Committee voted to retain M3 Partners as their financial advisor, subject to Court approval.

9. The Firm has approximately 85 attorneys with a practice concentrated on corporate reorganizations, bankruptcy, litigation and commercial matters. The Firm's attorneys have extensive experience representing creditors' committees, debtors, creditors, trustees and others in a wide variety of bankruptcy cases. Attorneys of the Firm have extensive experience representing creditors' committees in complex chapter 11 cases in this District and others, including in *Eddie Bauer LLC*, *Careismatic Brands, LLC, Bed, Bath & Beyond, Inc*., *David's Bridal, LLC*, *RTW*

Retailwinds, Inc., *Frank Theatres Bayonne/South Cove, LLC*, *Ashley Stewart Holdings, Inc.*, *Pennsylvania Fashions, Inc.*, *Agway Farm & Home Supply, LLC*, *Alamo Drafthouse Cinemas Holdings, LLC*, *YouFit Health Clubs, LLC*, *Lucky Brand Dungarees, LLC*, *Art Van Furniture, LLC*, *CraftWorks Parent, LLC*, and *Earth Fare, Inc.*, among others. Based on these facts, the Committee believes that the Firm is well-qualified to render the services as described below.

Relief Requested

10. By this Application, the Committee respectfully requests that the Court enter an order, substantially in the form annexed hereto as **Exhibit C**, pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1, authorizing the Committee to employ and retain the Firm as its counsel in these Cases. The Committee seeks to retain the Firm, effective as of August 13, 2026, because the Firm began providing services to the Committee as of such date. The Committee believes that retroactive approval of its retention is appropriate in these Cases because the Committee required effective representation prior to such time as a retention application could be submitted to the Court due to the exigencies of these Cases, and the Firm has been providing services to the Committee since August 13, 2026.

Services to be Rendered

11. Subject to further order of this Court, the Firm is expected to render, among other services, the following services to the Committee:

a. Assisting, advising, and representing the Committee in its consultations with the Debtors regarding the administration of these Cases;

b. Assisting, advising, and representing the Committee with respect to the Debtors' retention of professionals and advisors with respect to the Debtors' business and these Cases;

c. Assisting, advising, and representing the Committee in analyzing the Debtors' assets and liabilities, investigating the extent and validity of liens and participating in and reviewing any proposed asset sales, any asset

dispositions, financing arrangements, and cash collateral stipulations or proceedings;

d. Assisting, advising, and representing the Committee in any manner relevant to reviewing and determining the Debtors' rights and obligations under leases and other executory contracts;

e. Assisting, advising, and representing the Committee in investigating the acts, conduct, assets, liabilities, and financial condition of the Debtors, the Debtors' operations, and the desirability of the continuance of any portion of those operations, and any other matters relevant to the Cases or to the formulation of a plan;

f. Assisting, advising, and representing the Committee in connection with any sale of the Debtors' assets;

g. Assisting, advising, and representing the Committee in its participation in the negotiation, formulation, or objection to any plan of liquidation or reorganization;

h. Assisting, advising, and representing the Committee in understanding its powers and its duties under the Bankruptcy Code and the Bankruptcy Rules and in performing other services as are in the interests of those represented by the Committee;

i. Assisting, advising, and representing the Committee in the evaluation of claims and on any litigation matters, including avoidance actions; and

j. Providing such other services to the Committee as may be necessary in these Cases.

12. PSZ&J will coordinate closely with M3 Partners ("M3"), the Committee's proposed financial advisor, to minimize the duplication of the services provided to the Committee by each professional and meet the scope of the services for which each firm is retained to provide.

No Adverse Interest and Disclosure of Connections

13. The Committee believes that PSZ&J does not hold or represent any interest that is adverse to the Committee and the Debtors' estates and does not hold or represent any interest adverse to and has no connection with the Committee, the Debtors, their creditors or any party in interest herein in the matters upon which PSZ&J is to be retained, except as set forth in the Sandler Declaration.

14. Other than as set forth in the Sandler Declaration, neither PSZ&J nor any of its attorneys has any connection with any party in interest or their attorneys or accountants, in these Cases.

15. Except as provided in the Sandler Declaration, to the best of the Committee's knowledge, neither PSZ&J, nor any of its attorneys, holds or represents any interest adverse to the Committee or the Debtors' estates in the matters on which they are to be retained, subject to PSZ&J's ongoing conflicts review. The Committee submits that its proposed employment of PSZ&J is in the best interests of the Committee and its members.

16. To the best of the Committee's knowledge, and except as disclosed in the Sandler Declaration, PSZ&J has had no other prior connection with the Debtors, their creditors or any other party in interest. Upon information and belief, PSZ&J does not hold or represent any interest adverse to the Debtors' estates, the Committee, or the creditors the Committee represents in the matters upon which it has been and is to be engaged.

17. PSZ&J represents many committees in other bankruptcy cases, the members of which (together with other creditors of these Cases) may be creditors of the Debtors. However, PSZ&J will not represent any members of those committees with respect to any claims that they may have collectively or individually against the Debtors.

18. Similarly, PSZ&J may represent, or may have represented, debtors, creditors' committees, or trustees in cases or proceedings against creditors of the Debtors that are unrelated to these Cases.

Professional Compensation

19. Subject to Court approval in accordance with section 330(a) of the Bankruptcy Code and any applicable orders of this Court, compensation will be payable to PSZ&J on an hourly

basis at PSZ&J's standard hourly rates pursuant to section 328(a) of the Bankruptcy Code, plus reimbursement of actual, necessary expenses and other charges incurred by PSZ&J. The current standard hourly rates for professionals and paralegals presently designated to represent the Committee are:

(a)	Partners/Counsel	$1,150.00 to $2,695.00 per hour
(b)	Associates	$725.00 to $1,350.00 per hour
(c)	Paralegals	$625.00 to 695.00 per hour

20. The hourly rates set forth above are subject to periodic adjustments to reflect economic and other conditions. Other attorneys and paralegals may from time to time serve the Committee in connection with the matters described herein. PSZ&J shall provide ten (10) days' prior notice of any such increases to the Debtors, and the U.S. Trustee and shall file such notice with the Court.

21. The hourly rates set forth above are PSZ&J's standard hourly rates for work of this nature. These rates are set at a level designed to fairly compensate PSZ&J for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses. It is PSZ&J's policy to charge its clients in all areas of practice for all other out-of-pocket expenses incurred in connection with the client's case. The expenses charged to clients include, Court filing fees, telephone and telecopier toll and other charges, mail and express mail charges, special or hand delivery charges, document retrieval, photocopying and scanning charges, charges for mailing supplies (including, without limitation, envelopes and labels) provided by PSZ&J to outside copying services for use in mass mailings, travel expenses, expenses for working meals, computerized research, transcription costs, as well as non-ordinary overhead expenses such as secretarial and other overtime. PSZ&J will charge the Committee for these expenses in a manner and at rates consistent with charges made generally to PSZ&J's other clients. PSZ&J believes that

it is more appropriate to charge these expenses to the clients incurring them than to increase the hourly rates and spread the expenses among all clients.

22. PSZ&J (i) will only bill 50% for non-working travel; (ii) will not seek the reimbursement of any fees or costs, including attorney fees and costs, arising from the defense of any objections to any of PSZ&J's fee applications in this case; (iii) will use the billing and expense categories set forth in the US Trustee Guidelines (Exhibit D-1 "Summary of Compensation Requested by Project Category"); and (iv) will provide any and all monthly fee statements, interim fee applications, and final fee applications in "LEDES" format to the U.S. Trustee.

Notice

23. Notice of this Application has been given to the following parties: (a) the U.S. Trustee for the District of New Jersey; (b) counsel for the Debtors; and (c) all parties requesting notice in these cases pursuant to Bankruptcy Rule 2002. The Committee submits that, in light of the nature of the relief requested, no other or further notice need be given.

No Prior Request

24. No previous application for the relief requested herein has been made to this or any other court.

[*Remainder of Page Intentionally Left Blank*]

WHEREFORE, the Committee respectfully requests entry of an order substantially in the form attached hereto as **Exhibit C**, authorizing the Committee to employ and retain PSZ&J as its counsel, effective as of August 13, 2026, and granting such other and further relief as is just and proper.

Dated: August 24, 2026

THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF POOLIN TECHNOLOGY PTE. LTD, *et al.*

By: */s/ Qi Su*
Qi Su, solely in his capacity as Chair of the Official Committee of Unsecured Creditors of Poolin Technology PTE. LTD, *et al.*, and not in his individual capacity

EXHIBIT A

Declaration of Bradford J. Sandler

UNITED STATES BANKRUPTCY COURT **DISTRICT OF NEW JERSEY**	
Caption in Compliance with D.N.J. LBR 9004-1(b) Bradford J. Sandler (N.J. Bar No. 009521996) Robert J. Feinstein (admitted *pro hac vice*) Shirley S. Cho (admitted *pro hac vice*) PACHULSKI STANG ZIEHL & JONES LLP 1700 Broadway, 36th Floor New York, NY 10019 Telephone: (212) 561-7700 Facsimile: (212) 561-7777 bsandler@pszjlaw.com rfeinstein@pszjlaw.com scho@pszjlaw.com *Proposed Counsel for the Official Committee of Unsecured Creditors*	
In re: POOLIN TECHNOLOGY PTE. LTD, *et a*l., Debtors.[1]	Case No. 26-18325 (EJO) Chapter 11 (Jointly Administered) Judge: Eamonn J. O'Hagan

DECLARATION OF BRADFORD J. SANDLER IN SUPPORT OF APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ORDER, PURSUANT TO 11 U.S.C. §§ 328 AND 1103, FED. R. BANKR. P. 2014, AND LOCAL RULE 2014-1, AUTHORIZING AND APPROVING THE EMPLOYMENT AND RETENTION OF PACHULSKI STANG ZIEHL & JONES LLP AS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF AUGUST 13, 2026

I, BRADFORD J. SANDLER, declare under penalty of perjury as follows:

1. I am a partner in the firm of Pachulski Stang Ziehl & Jones LLP ("PSZ&J" or the "Firm"), with offices located at 1700 Broadway, 36th Floor New York, NY 10019, and have been

[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.

duly admitted to practice law in the state of New Jersey. I am authorized to submit this declaration (the "Declaration") in support of the *Application of the Official Committee of Unsecured Creditors for Order, Pursuant to 11 U.S.C §§ 328 and 1103, Fed. R. Bankr. P. 2014, and Local Rule 2014-1, Authorizing and Approving the Employment and Retention of Pachulski Stang Ziehl & Jones LLP as Counsel to the Official Committee of Unsecured Creditors, Effective as of August 13, 2026* (the "Application").[2]

2. Neither I, the Firm, nor any partner, of counsel, or associate thereof, insofar as I have been able to ascertain, has any connection with the Debtors, their creditors or any other parties in interest herein, their respective attorneys and accountants, the U.S. Trustee, or any person employed in the Office of the U.S. Trustee, except as set forth herein.

Disclosure of Connections

3. Section 1103(b) of the Bankruptcy Code does not incorporate the general "disinterestedness" standard of section 327(a) of the Bankruptcy Code.

4. However, Bankruptcy Rule 2014 requires that an application for employment under section 1103 disclose all connections with the Debtor, its estate, the professionals and the U.S. Trustee. The Firm, therefore, discloses its known connections herein.

5. The Firm has made the following investigation of its connections prior to submitting this Declaration. The Firm has undertaken a full and thorough review of its computer database, which contains the names of clients and other parties in interest in particular matters. PSZ&J requires all of its professionals, before accepting the representation of a new client, or the representation of an existing client in a new matter, to perform a conflicts check through the Firm's database and to enter conflict information regarding new clients or new matters into that database.

[2] Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

Thus, a review of said computerized database should reveal any and all actual or potential conflicts of interest with respect to any given representation. In particular, an employee of the Firm, under my supervision, entered the names of interested parties provided by the Debtors through the Firm's database. Specifically, in addition to the Committee professionals and the Debtors' proposed counsel, the Firm obtained from the Debtors and their representatives the names of individuals and entities that may be parties in interest in these chapter 11 cases (the "Potential Parties in Interest"), as disclosed in Schedule 1 attached to Exhibit B to the Debtors' retention application (*See* Docket No. 125).

6. Further, PSZ&J represented, represents, and in the future will likely represent many committees in matters unrelated to the Debtors and these Cases, whose members may be creditors, equity holders, and/or committee members in these Cases. The Firm, however, is not representing any of those entities in these Cases and will not represent any members of these committees in any claims that they may have collectively or individually against the Debtors.

7. To date, it appears that PSZ&J does not hold or represent any interest adverse to and has no connection, subject to the disclosures set forth below and herein, with the Debtors herein, its creditors, the U.S. Trustee for the District of New Jersey, or any party in interest herein in the matters upon which PSZ&J is to be retained.

8. PSZ&J is continuing to conduct an ongoing review of its files to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new material facts, connections, or relationships are discovered or arise, PSZ&J will supplement its disclosure to the Court.

9. PSZ&J and certain of its partners, of counsel, and associates represented, represent and in the future will likely represent creditors of the Debtors in connection with matters unrelated to the Debtors and these Cases. At this time, the Firm is not aware of any such representations

except as noted herein. If the Firm identifies any further such representations, the Firm shall make further disclosures as may be appropriate at that time.

10. The Firm has represented, represents, and in the future will likely represent debtors and creditors committees in cases unrelated to the Debtors and these Cases wherein one or more of the firms representing the Debtors, Committee Members, or other parties-in-interest serve as or will serve as professionals.

11. PSZ&J is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code in that the Firm, its partners, of counsel and associates:

a. are not creditors, equity security holders or insiders of the Debtors;

b. are not and were not, within two (2) years before the Petition Date, a director, officer, or employee of the Debtors; and

c. do not have an interest materially adverse to the interests of the Debtors' estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtors, or for any other reason, except as disclosed herein.

Compensation

12. The Firm has not received a retainer from the Debtors or the Committee, nor has the Firm received any payment or promise of payment, during the one-year period prior to the Petition Date on this engagement. No compensation has been paid or promised to be paid from a source other than the Debtors' estates in these Cases on this engagement. No promises have been received by the Firm nor by any partners, of counsel or associates thereof as to compensation in connection with these Cases other than in accordance with the provisions of the Bankruptcy Code. The Firm has no agreement with any other entity to share with such entity any compensation received by the Firm in connection with these Cases, except among the partners, of counsel, and associates of the Firm. Neither the Committee nor its members (or any of their representatives) are or will be liable for fees or costs incurred by the Firm in its representation of the Committee.

13. Subject to Court approval in accordance with section 330(a) of the Bankruptcy Code and any applicable orders of this Court, compensation will be payable to PSZ&J on an hourly basis at PSZ&J's standard hourly rates pursuant to section 328(a) of the Bankruptcy Code, plus reimbursement of actual, necessary expenses and other charges incurred by PSZ&J. The current standard hourly rates for professionals and paralegals presently designated to represent the Committee are:

(a)	Partners/Counsel	$1,150.00 to $2,695.00 per hour
(b)	Associates	$725.00 to $1,350.00 per hour
(c)	Paralegals	$625.00 to $695.00 per hour

14. The hourly rates set forth above are the Firm's standard hourly rates for work of this nature, which are subject to adjustment from time to time. These rates are set at a level designed to fairly compensate the Firm for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses. These rates are subject to periodic adjustments to reflect economic and other conditions. Other attorneys and paralegals may from time to time serve the Committee in connection with the matters described herein, and the Firm will charge its standard hourly rates for their services. It is the Firm's policy to charge its clients in all areas of practice for all other out-of-pocket expenses incurred in connection with the client's case. The expenses charged to clients include, Court filing fees, telephone and telecopier toll and other charges, mail and express mail charges, special or hand delivery charges, document retrieval, photocopying and scanning charges, charges for mailing supplies (including, without limitation, envelopes and labels) provided by the Firm to outside copying services for use in mass mailings, travel expenses, expenses for working meals, computerized research, transcription costs, as well as non-ordinary overhead expenses such as secretarial and other overtime. The Firm will charge the Committee for these expenses in a manner and at rates consistent with charges made generally to the Firm's other clients and in accordance with the guidelines set forth in Local Bankruptcy Rule 2014-1, and all

amendments and supplemental standing orders of the Court. The Firm believes that it is more appropriate to charge these expenses to the clients incurring them than to increase the hourly rates and spread the expenses among all clients.

15. Subject to Court approval, the Committee is seeking to retain M3 Partners ("M3") as its financial advisor. PSZ&J intends to work closely with M3 to ensure that there is no unnecessary duplication of services performed or charged to the Debtors' estates.

U.S. Trustee Guidelines

16. PSZ&J provides the responses listed below as a courtesy to comply with the *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Case* (the "2013 UST Guidelines").[3] Pursuant to Part D1 of the 2013 UST Guidelines, PSZ&J is seeking employment as counsel for the Committee under sections 328 and 1103 of the Bankruptcy Code and it hereby provides the following responses set forth below:

Questions Required by Part D1 of 2013 UST Guidelines:	Answer:	Further Explanation:
Did you agree to any variations from, or alternatives to, your standard or customary billing arrangements for this engagement?	No.	N/A
Do any of the professionals included in this engagement vary their rate based on the geographic location of the bankruptcy case?	No.	N/A

[3] *See* 78 Fed. Reg. 36248 (June 17, 2013).

Questions Required by Part D1 of 2013 UST Guidelines:	Answer:	Further Explanation:
If you represented the client in the 12 months prepetition, disclose your billing rates and material financial terms for the prepetition engagement, including any adjustments during the 12 months prepetition. If your billing rates and material financial terms have changed postpetition, explain the difference and reasons for the difference.	PSZ&J did not represent the client in the 12 month period prepetition. The billing rates for PSZ&J are disclosed in the Application and are subject to periodic adjustment in accordance with the Firm's practice.	None.
Has your client approved your respective budget and staffing plan, and, if so, for what budget period?	No.	As Committee counsel, the Firm anticipates that the Committee's professional fees will be initially governed by the case budget. The Committee and its professionals reserve all rights to seek approval of Committee professional fees.

17. PSZ&J intends to make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the 2013 UST Guidelines, both in connection with this Application and the interim and final fee applications to be filed by PSZ&J in these Cases. As to these Cases and any other case in which PSZ&J may be involved, PSZ&J reserves all rights regarding the scope, application, and enforceability of the 2013 UST Guidelines.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 24, 2026

/s/ Bradford J. Sandler
Bradford J. Sandler

EXHIBIT B

Declaration of Committee Chair

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b) Bradford J. Sandler (N.J. Bar No. 009521996) Robert J. Feinstein (admitted *pro hac vice*) Shirley S. Cho (admitted *pro hac vice*) PACHULSKI STANG ZIEHL & JONES LLP 1700 Broadway, 36th Floor New York, NY 10019 Telephone: (212) 561-7700 Facsimile: (212) 561-7777 bsandler@pszjlaw.com rfeinstein@pszjlaw.com scho@pszjlaw.com *Proposed Counsel for the Official Committee of Unsecured Creditors*	
In re: POOLIN TECHNOLOGY PTE. LTD, *et al*., Debtors.[1]	Case No. 26-18325 (EJO) Chapter 11 (Jointly Administered) Judge: Eamonn J. O'Hagan

DECLARATION OF COMMITTEE CHAIR IN SUPPORT OF APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ORDER, PURSUANT TO 11 U.S.C. §§ 328 AND 1103, FED. R. BANKR. P. 2014, AND LOCAL RULE 2014-1, AUTHORIZING AND APPROVING THE EMPLOYMENT AND RETENTION OF PACHULSKI STANG ZIEHL & JONES LLP AS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF AUGUST 13, 2026

Qi Su declares under penalty of perjury as follows:

1. I, Qi Su, was elected as the Chair of the Official Committee of Unsecured Creditors (the "Committee") appointed in the bankruptcy cases (the "Cases") of the above-captioned debtors

[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.

(the "Debtors"). I am authorized to submit this declaration (the "Declaration") on behalf of the Committee in support of the *Application of the Official Committee of Unsecured Creditors for Order, Pursuant to 11 U.S.C §§ 328 and 1103, Fed. R. Bankr. P. 2014, and Local Rule 2014-1, Authorizing and Approving the Employment and Retention of Pachulski Stang Ziehl & Jones LLP as Counsel to the Official Committee of Unsecured Creditors Effective as of August 13, 2026* (the "Application").[2]

The Committee's Selection of PSZ&J as Counsel

2. Pachulski Stang Ziehl & Jones LLP ("PSZ&J" or the "Firm") is proposed to serve as counsel to the Committee. The Committee recognizes that a review process is necessary in managing counsel to ensure that bankruptcy professionals are subject to the same scrutiny and accountability as professionals in non-bankruptcy engagements. The review process utilized by the Committee here assessed potential committee counsel based on their expertise in the relevant legal issues and in similar proceedings.

3. On August 12, 2026, the United States Trustee for the District of New Jersey (the "U.S. Trustee") appointed an official committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code [Docket No. 112].

4. On August 13, 2026, the Committee voted to retain PSZ&J to serve as counsel to the Committee and on August 17, 2026, the Committee voted to retain M3 Partners as their financial advisor, subject to Court approval.

5. The Committee believes that PSZ&J's extensive experience in corporate reorganizations, both out-of-court and under chapter 11 of the Bankruptcy Code, makes it well

[2] Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

qualified to represent the Committee in these Cases in an efficient and timely manner. Thus, the Committee decided to retain PSZ&J as the Committee's counsel during these chapter 11 cases.

Rate Structure

6. In my capacity as Chair and an authorized representative of the Committee, I am responsible, along with the other Committee members, for supervising counsel. PSZ&J has informed the Committee that its rates are consistent between bankruptcy representations, including related transactional and litigation services. PSZ&J has informed the Committee that its current hourly rates apply to non-bankruptcy services, if any, provided by the Firm, unless a contingent fee, mixed contingent fee, flat fee, or blended rate arrangement is agreed upon. The Firm does not maintain separate departments devoted to other legal practices different from the bankruptcy and insolvency areas. The Firm therefore does not have different billing rates and terms for non-bankruptcy engagements that can be compared to the billing rates and terms for the Committee's engagement of PSZ&J.

Cost Supervision

7. The members of the Committee further recognize that it is their responsibility to closely monitor the billing practices of their counsel to ensure the fees and expenses paid by the estates remain consistent with the Committee's expectations and the exigencies of the case. The Committee will review the invoices that PSZ&J regularly submits.

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

Dated: August 24, 2026

THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF POOLIN TECHNOLOGY PTE. LTD, *et al.*

By: */s/ Qi Su*
Qi Su, solely in his capacity as Chair of the Official Committee of Unsecured Creditors of Poolin Technology PTE. LTD, *et al.*, and not in his individual capacity

EXHIBIT C

Proposed Order

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b) Bradford J. Sandler (N.J. Bar No. 009521996) Robert J. Feinstein (admitted *pro hac vice*) Shirley S. Cho (admitted *pro hac vice*) PACHULSKI STANG ZIEHL & JONES LLP 1700 Broadway, 36th Floor New York, NY 10019 Telephone: (212) 561-7700 Facsimile: (212) 561-7777 bsandler@pszjlaw.com rfeinstein@pszjlaw.com scho@pszjlaw.com *Proposed Counsel for the Official Committee of Unsecured Creditors*	
In re: POOLIN TECHNOLOGY PTE. LTD, *et al*., Debtors.[1]	Case No. 26-18325 (EJO) Chapter 11 (Jointly Administered) Judge: Eamonn J. O'Hagan

ORDER AUTHORIZING AND APPROVING THE RETENTION OF PACHULSKI STANG ZIEHL & JONES LLP AS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF AUGUST 13, 2026

The relief set forth on the following pages, numbered two (2) through and including three (3), is hereby **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 *Application of the Official Committee of Unsecured Creditors for Order, Pursuant to 11 U.S.C §§ 328 and 1103, Fed. R. Bankr. P. 2014, and Local Rule 2014-1, Authorizing and Approving the Employment and Retention of Pachulski Stang Ziehl & Jones LLP as Counsel to the Official Committee of Unsecured Creditors Effective as of August 13, 2026* (the "Application");[2] and upon consideration of the Declarations of Bradford J. Sandler and the Committee Chair filed in support of the Application; and the Court having jurisdiction to consider the Application and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, and the Court having the power to enter a final order consistent with Article III of the United States Constitution; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and venue being proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that the relief requested in the Application is in the best interests of the Debtors' estates, their creditors and other parties-in-interest; and the Committee having provided adequate and appropriate notice of the Application under the circumstances; and after due deliberation and good and sufficient cause appearing therefor; and it appearing to the Court that the Application should be approved,

IT IS HEREBY ORDERED THAT:

1. The Application is GRANTED as set forth herein.

2. The Committee is hereby authorized to retain and employ PSZ&J as counsel to the Committee pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1, effective as of August 13, 2026.

[2] Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

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3. PSZ&J shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with the Debtors' Cases in compliance with the applicable provisions of the Bankruptcy Code, including section 330 of the Bankruptcy Code. Prior to applying any increases in its hourly rates beyond the rates set forth in the Application, PSZ&J shall provide ten (10) days' prior notice of any such increases to the Debtors, and the U.S. Trustee and shall file such notice with the Court. All parties in interest retain rights to object to any rate increase on all grounds, including the reasonableness standard set forth in section 330 of the Bankruptcy Code, and the Court retains the right to review any rate increase pursuant to section 330 of the Bankruptcy Code.

4. PSZ&J (i) shall only bill 50% for non-working travel; (ii) shall not seek the reimbursement of any fees or costs, including attorney fees and costs, arising from the defense of any objections to any of PSZ&J's fee applications in this case; (iii) shall use the billing and expense categories set forth in the US Trustee Guidelines (Exhibit D-1 "Summary of Compensation Requested by Project Category"); and (iv) provide any and all monthly fee statements, interim fee applications, and final fee applications in "LEDES" format to the U.S. Trustee.

5. PSZ&J is authorized to render professional services to the Committee as described in the Application. PSZ&J shall make reasonable efforts to avoid unnecessary duplication of services provided by any of the Committee's other retained professionals in these Cases.

6. The Committee and PSZ&J are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

7. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

8. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.