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

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 M3 ADVISORY PARTNERS, LP AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF AUGUST 17, 2026

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

The Official Committee of Unsecured Creditors (the "Committee") of the above-captioned debtors and debtors in possession (the "Debtors") hereby submits its application (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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"Application") for the entry of an order authorizing and approving the employment of M3 Advisory Partners, LP ("M3" or the "Firm") as financial advisor to the Committee in connection with the Debtors' chapter 11 cases (the "Cases"), effective as of August 17, 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 Kenneth Ehrler, a managing director at M3 (the "Ehrler Declaration"), attached hereto as **Exhibit A** and incorporated herein by reference, (ii) the declaration of Max Galka (the "Galka Declaration") attached hereto as **Exhibit B**, and (iii) the declaration of Committee Chair Qi Su (the "Committee Chair Declaration," and together with the Ehrler Declaration and Galka Declaration, the "Declarations") attached hereto as **Exhibit C** 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 Pachulski Stang Ziehl & Jones LLP to serve as counsel to the Committee and on August 17, 2026, the Committee voted to retain M3 as its financial advisor, including Max Galka ("Mr. Galka") as an independent subcontractor to M3, subject to Court approval.

9. M3 is a restructuring advisory firm specializing in corporate restructurings, operational improvement, dispute resolution, and valuation. The Firm's professionals have extensive experience representing creditors' committees, debtors, creditors, trustees and others in a wide variety of bankruptcy cases. M3's professionals have extensive experience representing creditors' committees in complex chapter 11 cases in this District and others, including in *In re Fat Brands Inc*., Case No. 26-90126 (ARP) (Bankr. S.D. Tex. 2026); *In re Dish DBS Corporation*, Case No. 26-90627 (CML) (Bankr. S.D. Tex. 2026); *In re First Brands Group LLC*, Case No. 25-

90399 (CML) (Bankr. S.D. Tex. 2025); *In re Everstream Solutions LLC*, No. 25-90144 (CML) (Bankr. S.D. Tex. 2025); *In re Hornblower Holdings LLC*, Case No. 24-90061 (MI) (Bankr. S.D. Tex. 2024); *In re Party City Holdco Inc*., No. 24-90621 (ARP) (Bankr. S.D. Tex. 2024); *In re Stoli Group (USA) LLC*, Case No. 24-80146 (SWE) (Bankr. N.D. Tex. 2024); *In re Fisker Inc*., Case No. 24-11390 (TMH) (Bankr. D. Del. 2024); *In re Voyager Digital Holdings, Inc.*, Case No. 22-10943 (MEW) (Bankr. S.D.N.Y. 2022); *In re Celsius Network LLC*, Case No. 22-10964 (MG) (Bankr. S.D.N.Y. 2022); *In re BlockFi, Inc.,* Case No. 22-19361 (MBK) (Bankr. D.N.J. 2022); *In re Neiman Marcus Group LTD LLC*, Case No. 20-32519 (DRJ) (Bankr. S.D. Tex. 2020); and *In re Tailored Brands, Inc.,* Case No. 20-33900 (MI) (Bankr. S.D. Tex. 2020), among others. Based on these facts, the Committee believes 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 D**, 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 financial advisor in these Cases. The Committee seeks to retain the Firm, effective as of August 17, 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 17, 2026.

11. The Committee is also familiar with the professional standing and reputation of Mr. Galka. The Committee understands and recognizes that Mr. Galka has extensive experience in blockchain and asset tracing and investigations in the cryptocurrency industry.

Services to be Rendered

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

a. Assisting in the analysis, review, and monitoring of the restructuring process, including, but not limited to, an assessment of the unsecured claims pool and potential recoveries for unsecured creditors;

b. Assisting, advising, and representing the Committee in analyzing the Debtors' assets and liabilities and participating in and reviewing any proposed asset sales, any asset dispositions, financing arrangements, and cash collateral stipulations or proceedings;

c. Developing information regarding the Debtors' assets and their potential values under different scenarios;

d. Monitoring and, to the extent appropriate, assisting in efforts to develop and solicit transactions that would support unsecured creditor recovery;

e. Assisting the Committee in identifying, valuing, and pursuing estate causes of action, including, but not limited to, relating to prepetition transactions;

f. Assisting the Committee in analyzing, classifying and addressing claims against the Debtors and to participate effectively in any effort in this chapter 11 case to estimate (in any formal or informal sense) contingent, unliquidated, and disputed claims;

g. Advising the Committee in negotiations with the Debtors, certain of the Debtors' stakeholders, and third parties;

h. Assisting the Committee in reviewing the Debtors' financial reports;

i. Assisting the Committee in reviewing the Debtors' cost/benefit analysis with respect to the assumption or rejection of various executory contracts and leases;

j. Reviewing and providing analysis of the present and any subsequently proposed or potential debtor-in-possession financing or use of cash collateral;

k. Assisting the Committee in evaluating and analyzing avoidance actions, including fraudulent conveyances and preferential transfers;

l. Assisting the Committee in investigating the existence and value of any unencumbered assets held by the Debtors;

m. Reviewing and providing analysis of any proposed disclosure statement and chapter 11 plan and, if appropriate, assisting the Committee in developing an alternative chapter 11 plan;

n. Attending meetings and assisting in discussions with the Committee, the Debtors, the U.S. Trustee and other parties in interest and professionals;

o. Presenting at meetings of the Committee, as well as meetings with other key stakeholders and parties;

p. Performing such other advisory services for the Committee as may be necessary or proper in this proceeding, subject to the aforementioned scope; and

q. Providing testimony on behalf of the Committee as and when may be deemed appropriate.

13. Mr. Galka will advise on various case matters, including estate causes of action, avoidance actions, estate assets and claims, unencumbered assets, financial information prepared by the Debtors, investigation and litigation support, potentially through testimony, and other such general business matters as the Committee or its counsel may deem necessary, which would be communicated and coordinated through M3.

14. M3 will coordinate closely with Pachulski Stang Ziehl & Jones LLP, the Committee's proposed counsel, 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

15. The Committee believes that M3 and Mr. Galka do 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 M3 is to be retained, except as set forth in the Ehrler Declaration and the Galka Declaration.

16. Other than as set forth in the Ehrler Declaration and the Galka Declaration, neither M3 nor any of its professionals nor Mr. Galka has any connection with any party in interest or their attorneys or accountants, in these Cases.

17. Except as provided in the Ehrler Declaration and the Galka Declaration, to the best of the Committee's knowledge, neither M3 nor any of its professionals nor Mr. Galka 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 M3's ongoing conflicts review. The Committee submits that its proposed employment of M3 and Mr. Galka are in the best interests of the Committee and its members.

18. To the best of the Committee's knowledge, and except as disclosed in the Ehrler Declaration and the Galka Declaration, M3 and Mr. Galka have had no other prior connection with the Debtors, their creditors or any other party in interest. Upon information and belief, M3 and Mr. Galka do 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.

19. M3 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, M3 will not represent any members of those committees with respect to any claims that they may have collectively or individually against the Debtors.

20. Similarly, M3 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

21. 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 M3 on an hourly basis at M3's standard hourly rates pursuant to section 328(a) of the Bankruptcy Code, plus reimbursement of actual, necessary expenses and other charges incurred by M3. The current standard hourly rates for M3's professionals are:

Title	Hourly Rate
Managing Partner	$1,500
Senior Managing Director	$1,390
Managing Director	$1,150 - $1,290
Senior Director	$1,120
Director	$940 - $1,060
Vice President	$840
Senior Associate	$725
Associate	$615
Analyst	$500

22. Mr. Galka's hourly rate in this matter is $1,000, which is at cost to M3. M3 is not making a profit on Mr. Galka's hourly rate.

23. The hourly rates set forth above are subject to periodic adjustments to reflect economic and other conditions. M3 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.

24. The hourly rates set forth above are M3's standard hourly rates for work of this nature. These rates are set at a level designed to fairly compensate M3 for the work of its professionals to cover fixed and routine overhead expenses. It is M3'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 travel, lodging, meals (out-of-town and local overtime), duplicating, research, messenger, and telephone charges. M3 will charge the Committee for these expenses in a manner and at rates consistent with charges made generally to M3's other clients. M3 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.

25. M3 (i) will only bill 50% for non-working travel; (ii) will not seek the reimbursement of any fees or costs, arising from the defense of any objections to any of M3'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.

26. Notwithstanding anything in the Application to the contrary, M3 shall (i) to the extent that M3 uses the services of independent contractors or subcontractors (collectively, the "Contractors") in this case, pass through the cost of such Contractors to the estate at the same rate that M3 pays the Contractors; (ii) seek reimbursement for actual costs only; (iii) ensure that the Contractors are subject to the same conflicts checks as required for M3; and (iv) file with this Court such disclosures required by Bankruptcy Rule 2014. M3 has entered into a professional services agreement with Mosaic Dataworks LLC, the entity through which Mr. Galka provides services to M3 and Mr. Galka will serve as an independent contractor to M3 in connection with this matter.

Indemnification

27. In addition to the foregoing, and as a material part of the consideration for the agreement of M3 to furnish services to the Committee pursuant to the terms of this Application,

M3 believes that the following indemnification terms are customary and reasonable for financial advisors in chapter 11 cases:

a. Subject to the provisions of subparagraphs (b) and (c) below, the Debtors are authorized to indemnify, and shall indemnify M3 for any claims arising from, related to or in connection with the services to be provided by M3, but not for any claims arising from, related to or in connection with M3's post-petition performance of any other services other than those in connection with the engagement, unless such post-petition services and indemnification therefore are approved by this Court; and

b. The Debtors shall have no obligation to indemnify M3, or provide contribution or reimbursement to M3, for any claim or expense that is either: (i) judicially determined (the determination having become final) to have arisen from M3's actual fraud, breach of fiduciary duty, if any, gross negligence, willful misconduct, self-dealing, or bad faith; (ii) for a contractual dispute in which the Committee or the Debtors allege the breach of M3's contractual obligations if the Court determines that indemnification, contribution, or reimbursement would not be permissible pursuant to applicable law, or (iii) settled prior to a judicial determination as to the exclusions set forth in clause (i) and (ii) above, but determined by this Court, after notice and a hearing, to be a claim or expense for which M3 should not receive indemnity, contribution or reimbursement; and

c. If, before the earlier of (i) the entry of an order confirming a chapter 11 plan in this case (that order having become a final order no longer subject to appeal), or (ii) the entry of an order closing this case, M3 believes that it is entitled to the payment of any amounts by the Debtors on account of indemnification, contribution, and/or reimbursement obligations (other than reimbursement of reasonable and customary out-of-pocket expenses incurred in the ordinary course of delivering the services contemplated hereby), including without limitation the advancement of defense costs, M3 must therefore file an application in this Court, and the Debtors may not pay any such amounts to M3 before the entry of an order by this Court approving the payment. This subparagraph (c) is intended only to specify the period of time under which the Court shall have jurisdiction over any request for fees and expenses by M3 for indemnification, contribution, or reimbursement, and not to limit the duration of the Debtor's obligation to indemnify M3. All parties in interest shall retain the right to object to any application by M3 for indemnification, contribution, or reimbursement.

28. The Committee believes that indemnification is customary and reasonable for financial advisors in chapter 11 proceedings. *See In re Joan & David Halpern, Inc*., 248 B.R. 43 (Bankr. S.D.N.Y. 2000).

Notice

29. 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

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

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WHEREFORE, the Committee respectfully requests entry of an order substantially in the form attached hereto as **Exhibit D**, authorizing the Committee to employ and retain M3 as its financial advisor, including Mr. Galka as an independent contractor to M3, effective as of August 17, 2026, and granting such other and further relief as is just and proper.

Dated: September 4, 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 Kenneth Ehrler

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 KENNETH EHRLER 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 M3 ADVISORY PARTNERS, LP AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF AUGUST 17, 2026

I, KENNETH EHRLER, declare under penalty of perjury as follows:

1. I am a managing director at M3 Advisory Partners, LP ("M3" or the "Firm"), with multiple offices throughout the country. I am authorized to submit this declaration (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.

"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 M3 Advisory Partners, LP as Financial Advisor to the Official Committee of Unsecured Creditors, Effective as of August 17, 2026* (the "Application").[2]

2. Neither I, the Firm, nor any professional thereof, insofar as I have been able to ascertain, has any connection with the Debtors, their creditors or any other parties in interest herein, 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 current and recent connections herein.

5. The Firm uses certain procedures (the "Procedures") to determine its relationships, if any, to parties that may have a connection to any of the Debtors in the Chapter 11 Cases. In implementing the Procedures, the following actions were taken to identify parties that may have connections to the Debtors and to determine M3's relationship with such parties:

a. M3 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

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

Parties in Interest"), as disclosed in Exhibit 1 attached to Exhibit B to the Debtors' retention application (Docket No. 14).

b. M3 then reviewed the names of each of the Potential Parties in Interest and compared the names on the list with its records concerning current and former clients and key parties in interest with respect to those current and former clients.

c. Known connections between former or recent clients of M3 and the Potential Parties in Interest were compiled for purposes of preparing this Declaration. These connections are listed on Schedule 1 annexed hereto.

6. Further, M3 represented, represents, and in the future will likely represent many committees and other constituencies 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 M3 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 M3 is to be retained.

8. M3 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, M3 will supplement its disclosure to the Court.

9. M3 and certain of its professionals 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, creditors' committees and other constituencies 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. Based upon the foregoing, I submit that M3 is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code in that the Firm and its professionals:

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 of its professionals 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. 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 M3 on an hourly basis at M3's standard hourly rates pursuant to section 328(a) of the Bankruptcy Code, plus reimbursement of actual, necessary expenses and other charges incurred by M3. The current standard hourly rates for M3's professionals are:

Title	Hourly Rate
Managing Partner	$1,500
Senior Managing Director	$1,390
Managing Director	$1,150 - $1,290
Senior Director	$1,120
Director	$940 - $1,060
Vice President	$840
Senior Associate	$725
Associate	$615
Analyst	$500

14. The core team members, in addition to Mr. Galka, expected to provide services on this matter are set forth below along with their hourly rates:

Name	Title	Hourly Rate
Kenneth Ehrler	Managing Director	$1,290
Robert Winning	Managing Director	$1,290
John Magliano	Vice President	$840
Julia Jiang	Senior Associate	$725
Isaac Frankel	Analyst	$500

15. Other professionals may from time to time serve the Committee in connection with the matters described herein, and M3 will charge its standard hourly rates for the services.

16. The hourly rates set forth above are the Firm's standard hourly rates for work of this nature. These rates are set at a level designed to fairly compensate the Firm for the work of its professionals and to cover fixed and routine overhead expenses. These rates are subject to periodic adjustments to reflect economic and other conditions. 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 travel, lodging, meals (out-of-town and local overtime), duplicating, research, messenger, and telephone charges. 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.

17. M3 may use independent contractors in the provision of its services to the Committee and, in the event that it does so, M3 intends to include as an expense reimbursement in its fee applications the amounts invoiced to M3 by independent contractors without any markup or increase. To the extent M3 utilizes the services of independent contractors, the independent contractor will file a separate declaration in support of the Application.

18. In this matter, M3 intends to utilize the services of Max Galka ("Mr. Galka"). M3 has entered into a professional services agreement with Mosaic Dataworks LLC, the entity through which Mr. Galka provides services to M3. I understand that Mr. Galka has extensive experience in blockchain and asset tracing and investigations in the cryptocurrency industry, and may advise on various case matters, including estate causes of action, avoidance actions, estate assets and claims, unencumbered assets, financial information prepared by the Debtors, investigation and litigation support, potentially through testimony, and other such general business matters as the Committee or its counsel may deem necessary.

19. Subject to Court approval, the Committee is seeking to retain Pachulski Stang Ziehl & Jones LLP ("PSZ&J") as its counsel. M3 intends to work closely with PSZ&J to ensure that there is no unnecessary duplication of services performed or charged to the Debtors' estates.

Dated: September 4, 2026

/s/ Kenneth Ehrler
Kenneth Ehrler

SCHEDULE 1

Potential Connections or Related Parties

Potential Connections or Related Parties[1]

- In the ordinary course of its financial advisory practice, M3 Advisory Partners, LP or its senior professionals (collectively, "M3") have recently had and/or currently have relationships with various law firms, accounting firms, financial advisory firms, claims agents, and other professionals and service providers, as well as affiliates of the foregoing who are listed on Exhibit 1 attached to Exhibit B to the Debtors' retention application (Docket No. 14) (the "***Debtor Disclosure Schedule***") as parties-in-interest in these proceedings (each, an "***Ancillary Entity***"). Such relationships have included, among other things, M3 or its senior professionals serving as an advisor to clients in engagements where (a) such client was or is represented by one or more Ancillary Entities or (b) one or more Ancillary Entities has represented or currently represents one or more parties-in-interest who are not clients of M3. Additionally, certain of the Ancillary Entities may have retained, or been retained by M3 and its affiliates, in the recent past with respect to matters unrelated to the Debtors and their bankruptcy cases. The Persons shown on the Debtors' Disclosure Schedule who constitute (or whose affiliates constitute) Ancillary Entities include, without limitation, Crowe LLP and Verita Global LLC. To the best knowledge of the senior professionals at M3 on the date hereof, such relationships have been unrelated to the Debtors, do not create interests adverse to the Debtors and are not in connection with these proceedings.

- M3 currently purchases or recently has purchased goods and services in the ordinary course of business and in the open market from vendors who are listed on the Debtors' Disclosure Schedule as parties-in-interest to these proceedings. Similarly, clients of M3, and debtors and parties-in-interest with respect to matters in which M3 is currently involved or recently has been involved in various capacities, also purchase or recently have purchased, or sell or recently have sold, goods and services in the ordinary course of business and in the open market from or to certain of the Persons listed on the Debtors' Disclosure Schedule as parties-in-interest to these proceedings. To the best knowledge of the senior professionals at M3 on the date hereof, such relationships have been unrelated to the Debtors, do not create interests adverse to the Debtors and are not in connection with these proceedings.

- M3 currently serves or recently has served as a financial advisor to various Persons which have (a) purchased, or currently purchase, insurance (including, without limitation, health and similar insurance), suretyship, employment benefits services (including, without limitation, as third-party administrator), or utilities from, (b) leased property or assets from landlords or lease counterparties who are, or (c) recently have been or are subject to the taxing or other regulatory authority of, Persons listed on the Debtors' Disclosure Schedule as parties-in-interest to these proceedings. In addition, M3 itself purchases or has recently purchased insurance, suretyship, employments benefits services or utilities from, or currently or recently has leased property or

[1] References in this Schedule to parties-in-interest with which M3 currently has or recently has had relationships in any category described above are not exclusive and the party-in-interest or an affiliate thereof also may have other relationships with M3 in the same or other categories without specific identification. All disclosures contained herein are made to the knowledge of M3 based upon parties-in-interest disclosures provided in various engagements and other information of which the senior professionals at M3 have actual knowledge. For purposes of this Schedule, the term "Persons" shall include entities and natural persons and any reference to a specific Person shall be deemed to also be a reference to affiliates of such Person.

assets from, or is or recently has been subject to the taxing or other regulatory authority of, Persons who are listed on the Debtors' Disclosure Schedule as parties-in-interest to these proceedings. To the best knowledge of the senior professionals at M3 on the date hereof, such relationships have been unrelated to the Debtors, do not create interests adverse to the Debtors and are not in connection with these proceedings.

- In the ordinary course of its business, M3 provides services to Persons currently or recently conducting, or involved in, bankruptcy proceedings in various federal bankruptcy courts in the United States. In connection with these proceedings and otherwise in the ordinary course of its business, M3 interacts with Judges of the United States Bankruptcy Courts and personnel of the Office of the United States Trustee in various jurisdictions, including, without limitation, those of the District of New Jersey. To the best knowledge of the senior professionals at M3 on the date hereof, such relationships have been unrelated to the Debtors, do not create interests adverse to the Debtors and are not in connection with these proceedings.

EXHIBIT B

Declaration of Max Galka

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 MAX GALKA 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 M3 ADVISORY PARTNERS, LP AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF AUGUST 17, 2026

I, MAX GALKA, declare under penalty of perjury as follows:

1. I am an independent contractor for M3 Advisory Partners, LP ("M3"). I submit this declaration (the "Declaration") on behalf of M3 in support of the *Application of the Official*

[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.

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 M3 Advisory Partners, LP as Financial Advisor to the Official Committee of Unsecured Creditors, Effective as of August 17, 2026 (the "Application").2 I have personal knowledge of the matters herein.

Disinterestedness and Eligibility

2. In connection with the preparation of this Declaration, I conducted a review of contacts with the Debtors, their affiliates, certain entities holding large claims against or interests in the Debtors, as well as other parties-in-interest, that were made known to M3. A listing of the parties (the "Potential Parties In Interest") reviewed is reflected in Exhibit 1 attached to Exhibit B to the Debtors' retention application (Docket No. 14). My review consisted of a review of the Potential Parties in Interest for any potential individuals or entities with whom I have a current or recent relationship.

3. Based on the results of my analysis, I do not have a relationship with any of the Potential Parties in Interest related to the Debtors or the Debtors' Chapter 11 Cases. I have conducted business through my previous or current employment or current consulting work, and could reasonably expect to conduct business in various ways unrelated to the Debtors or the Debtors' Chapter 11 Cases with various entities identified as Potential Parties in Interest.

4. As part of my previous or current employment or current consulting work, I have been responsible for blockchain and asset tracing, conducted investigations and testified as an expert witness that involve many different professionals and vendors, including attorneys and financial consultants along with other vendors who may represent claimants or Potential Parties in

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

Interest in the Debtors' Chapter 11 Cases. As a result of prior or current employment, I may also have had, or have in the future, interactions or connections with certain of the government authorities that are Potential Parties in Interest in matters wholly unrelated to the Debtors or these Chapter 11 Cases.

5. In the future, I may work with various attorneys and law firms, or be represented by attorneys and law firms, some of whom may be involved in the proceedings. In addition, in the future, I may work with or against other professionals involved in these Chapter 11 Cases in matters unrelated to the Debtors and these Chapter 11 Cases.

6. To the best of my knowledge and except as otherwise disclosed herein, no business relationship with or services have been provided to these parties in interest that involve their rights in the Debtors' Chapter 11 Cases, nor does my involvement in these Chapter 11 Cases compromise its ability to continue such consulting services. Based on my current knowledge of the professionals involved, and to the best of my knowledge, none of these relationships create interests adverse to the Debtors' estates and none are in connection with the Debtors' Chapter 11 Cases.

7. I am not a "creditor" of the Debtors within the meaning of section 101(10) of the Bankruptcy Code. Further, I, to the best of my knowledge, (a) am not a creditor, equity security holder or insider of the Debtor; (b) was not within two years before the Petition Date, a director, officer or employee of the Debtor; or (c) do not have any interest materially adverse to the interests of the Debtors' estates 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. As such, to the best of my knowledge, and based upon the results of the relationship search described above and disclosed herein, I am (i) a "disinterested person" as defined in section

101(14) of the Bankruptcy Code and (ii) do not hold or represent any interest adverse to the Debtors' estates. Therefore, I believe I am eligible to represent the Committee as part of the M3 retention.

8. It is my intent to update and expand my ongoing relationship search for additional parties in interest in an expedient manner. If any new material relevant facts or relationships are discovered by myself, then I will file a supplemental declaration pursuant to Bankruptcy Rule 2014(a).

Compensation

9. Subject to Court approval and in accordance with the applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Local Rules, orders of this Court and applicable U.S. Trustee guidelines, I will seek payment for compensation on an hourly basis, plus reimbursement of actual and necessary expenses incurred, including legal fees related to the Application and the preparation of future fee applications, as approved by the Court. My hourly rate in this matter is $1,000, which is at cost to M3. M3 is not making a profit on my hourly rate. I have never received any payments from the Debtors, performed professional services for the Debtors nor incurred any reimbursable expenses on behalf of the Debtors.

10. To the best of my knowledge: (i) no commitments have been made or received by myself with respect to compensation or payment in connection with these Chapter 11 Cases other than in accordance with the provisions of the Bankruptcy Code; and (ii) I have no agreement with any other entity to share with such entity any compensation received by myself in connection with these Chapter 11 Cases.

[*Remainder of Page Intentionally Left Blank*]

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 4, 2026

/s/ Max Galka
Max Galka

EXHIBIT C

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 M3 ADVISORY PARTNERS, LP AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF AUGUST 17, 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 M3 Advisory Partners, LP as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of August 17, 2026* (the "Application").[2]

The Committee's Selection of M3 Advisory Partners, LP as Financial Advisor

2. M3 Advisory Partners, LP ("M3" or the "Firm") is proposed to serve as financial advisor, including Max Galka ("Mr. Galka") as an independent subcontractor to M3, to the Committee. M3 was selected by the Committee after due consideration and deliberation, which involved interviewing four financial advisory firms, and then further diligence on the final two candidates regarding their fee structure (including hourly rates and other charges), core team members, among other key considerations, leading to the final selection of M3. The Committee recognizes that a review process is necessary in managing the financial advisor 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 financial advisors based on their expertise in the relevant financial 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].

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

4. On August 13, 2026, the Committee voted to retain Pachulski Stang Ziehl & Jones LLP to serve as counsel to the Committee and on August 17, 2026, the Committee voted to retain M3 as its financial advisor, including Mr. Galka as an independent subcontractor to M3, subject to Court approval.

5. The Committee believes that M3's extensive experience in corporate reorganizations, both out-of-court and under chapter 11 of the Bankruptcy Code, makes it well qualified to represent the Committee in these Cases in an efficient and timely manner. Thus, the Committee decided to retain M3 as the Committee's financial advisor during these chapter 11 cases.

6. The Committee reviewed the professional background and prior relevant work of Mr. Galka. The Committee understands and recognizes that Mr. Galka has extensive experience in blockchain and asset tracing and investigations in the cryptocurrency industry.

Rate Structure

7. In my capacity as Chair and an authorized representative of the Committee, I am responsible, along with the other Committee members, for supervising professionals. M3 has informed the Committee that its rates are consistent between bankruptcy representations. M3 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 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 M3.

Cost Supervision

8. The members of the Committee further recognize that it is their responsibility to closely monitor the billing practices of their professionals 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 M3 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: September 4, 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 D

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 M3 ADVISORY PARTNERS, LP AS FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS OF AUGUST 17, 2026

The relief set forth on the following pages, numbered two (2) through and including five (5), 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 M3 Advisory Partners, LP as Financial Advisor to the Official Committee of Unsecured Creditors Effective as of August 17, 2026* (the "Application");[2] and upon consideration of the Declarations of Kenneth Ehrler, Max Galka, 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] Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

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2. The Committee is hereby authorized to retain and employ M3 as financial advisor 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 17, 2026.

3. M3 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, M3 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. M3 (i) shall only bill 50% for non-working travel; (ii) shall not seek the reimbursement of any fees or costs, arising from the defense of any objections to any of M3'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. M3 is authorized to render professional services to the Committee as described in the Application. M3 shall make reasonable efforts to avoid unnecessary duplication of services provided by any of the Committee's other retained professionals in these Cases.

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6. Notwithstanding anything in the Application to the contrary, M3 shall (i) to the extent that M3 uses the services of independent contractors or subcontractors (collectively, the "Contractors") in this case, pass through the cost of such Contractors to the estate at the same rate that M3 pays the Contractors; (ii) seek reimbursement for actual costs only; (iii) ensure that the Contractors are subject to the same conflicts checks as required for M3; and (iv) file with this Court such disclosures required by Bankruptcy Rule 2014. In connection with the Debtors' Chapter 11 Cases, M3 has entered into a professional services agreement with Mosaic Dataworks LLC, the entity through which Mr. Galka provides services to M3, for his services and Mr. Galka will serve as an independent contractor in this matter.

7. The Debtors are authorized to indemnify, and shall indemnify, M3 for any claims arising from, related to or in connection with the services to be provided by M3, subject to the following conditions:

a. Subject to the provisions of subparagraphs (b) and (c) below, the Debtors are authorized to indemnify, and shall indemnify M3 for any claims arising from, related to or in connection with the services to be provided by M3, but not for any claims arising from, related to or in connection with M3's post-petition performance of any other services other than those in connection with the engagement, unless such post-petition services and indemnification therefore are approved by this Court; and

b. The Debtors shall have no obligation to indemnify M3, or provide contribution or reimbursement to M3, for any claim or expense that is either: (i) judicially determined (the determination having become final) to have arisen from M3's actual fraud, breach of fiduciary duty, if any, gross negligence, willful misconduct, self-dealing, or bad faith; (ii) for a contractual dispute in which the Committee or the Debtors allege the breach of M3's contractual obligations if the Court determines that indemnification, contribution, or reimbursement would not be permissible pursuant to applicable law, or (iii) settled prior to a judicial determination

as to the exclusions set forth in clause (i) and (ii) above, but determined by this Court, after notice and a hearing, to be a claim or expense for which M3 should not receive indemnity, contribution or reimbursement; and

c. If, before the earlier of (i) the entry of an order confirming a chapter 11 plan in this case (that order having become a final order no longer subject to appeal), or (ii) the entry of an order closing this case, M3 believes that it is entitled to the payment of any amounts by the Debtors on account of indemnification, contribution, and/or reimbursement obligations (other than reimbursement of reasonable and customary out-of-pocket expenses incurred in the ordinary course of delivering the services contemplated hereby), including without limitation the advancement of defense costs, M3 must therefore file an application in this Court, and the Debtors may not pay any such amounts to M3 before the entry of an order by this Court approving the payment. This subparagraph (c) is intended only to specify the period of time under which the Court shall have jurisdiction over any request for fees and expenses by M3 for indemnification, contribution, or reimbursement, and not to limit the duration of the Debtors' obligation to indemnify M3. All parties in interest shall retain the right to object to any application by M3 for indemnification, contribution, or reimbursement.

8. The Committee and M3 are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

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

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