IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:)
) Chapter 11
PLASTIQ INC., et al., ¹)
_ ,) Case No. 23-10671 (BLS)
Debtors.)
) (Jointly Administered)
)) Hearing Date:
	September 14, 2023 at 10:00 a.m. (ET)
	Response Deadline:
	August 24, 2023 at 4:00 p.m. (ET)

DEBTORS' FIRST (1ST) OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CLAIMS PURSUANT TO SECTION 502 OF THE BANKRUPTCY CODE, BANKRUPTCY RULE 3007 AND LOCAL RULE 3007-1

PARTIES RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND THEIR DISPUTED CLAIMS IDENTIFIED ON EXHIBIT A TO THE PROPOSED ORDER

The above-captioned debtors and debtors in possession (together, the "Debtors") hereby file this objection (this "Objection"), pursuant to section 502 of title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (the "Bankruptcy Code"), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Rule 3007-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), to each of the claims filed against the Debtors and their estates that are listed on Exhibit A (collectively, the "Disputed Claims") to the proposed form of order attached hereto as Exhibit 2 (the "Proposed Order"), and request the entry of the Proposed Order disallowing and expunging the Disputed Claims, as indicated in further detail below and on Exhibit A to the Proposed Order.

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Plastiq Inc. (6125), PLV Inc. d/b/a/ PLV TX Branch Inc. (5084), and Nearside Business Corp. (N/A). The corporate headquarters and the mailing address for the Debtors is 1475 Folsom Street, Suite 400, San Francisco, California 94103.



In support of this Objection, the Debtors rely on the declaration of Scott Canna (the "Canna Declaration"), a copy of which is attached hereto as Exhibit 1. In further support of this Objection, the Debtors respectfully represent as follows:

JURISDICTION AND VENUE

- 1. The Court has jurisdiction over these Chapter 11 Cases and this Motion pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012 (the "Amended Standing Order"). This is a core proceeding pursuant to 28 U.S.C. § 157(b) and this is a proceeding for which the Court may enter a final order under Article III of the U.S. Constitution. Venue of the Chapter 11 Cases (as defined below) and this Motion in this district is proper under 28 U.S.C. § 1408 and 1409.
- 2. The statutory and legal predicates for the relief sought herein are section 502 of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rule 3007-1.

BACKGROUND

I. General

- 3. On May 24, 2023 (the "**Petition Date**"), each of the Debtors commenced a voluntary case under chapter 11 of the Bankruptcy Code. The Debtors are authorized to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.
- 4. On June 7, 2023, the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee") appointed a statutory committee of unsecured creditors (the "Committee") pursuant to section 1102(a)(1) of the Bankruptcy Code [Docket No. 65]. No trustee or examiner has been appointed in these Chapter 11 Cases.

- 5. Additional information regarding the Debtors' business, their capital structure, and the circumstances leading to the filing of these chapter 11 cases is set forth in the First Day Declaration.
- 6. On July 6, 2023, the Debtors filed the *Combined Disclosure Statement and Chapter 11 Plan of Plastiq Inc. and Its Affiliated Debtors* [Docket No. 168] (the "Initial Combined Disclosure Statement and Plan"). The Debtors filed a revised version of the Initial Combined Disclosure Statement and Plan on July 25, 2023 [Docket No. 207], which the Debtors further revised on July 31, 2023 [Docket No. 224] (the "Combined Disclosure Statement and Plan").
- 7. On July 27, 2023, the Court entered the Order (I) Approving the Combined Disclosure Statement and Plan on an Interim Basis for Solicitation Purposes Only; (II) Establishing Solicitation and Tabulation Procedures; (III) Approving the Form of Ballots and Solicitation Materials; (IV) Establishing the Voting Record Date; (V) Fixing the Date, Time, and Place for the Combined Hearing and the Deadline for Filing Objections Thereto; (VI) Establishing Bar Date for Filing Requests for Allowance of Initial Administrative Claims; and (VII) Granting Related Relief [Docket No. 227] (the "Solicitation Procedures Order"). The Solicitation Procedures Order established August 10, 2023, as the deadline to object to claims for voting purposes. In addition to objecting to the validity of the Disputed Claims, by this Objection, the Debtors object to the Disputed Claims for purposes of voting on the Combined Disclosure Statement and Plan.
- 8. On July 27, 2023, the Court held a hearing on the sale of substantially all of the Debtors' assets (the "Sale") to Plastiq, Powered by Priority, LLC ("Priority"). On July 31, 2023, the Court entered an order approving the Sale of the Debtors assets (the "Sale Order") [Docket No. 223]. The Sale closed on July 31, 2023.

9. Now that the Sale has closed, the Debtors are focused on winding-down their estates and pursuing confirmation of the Combined Disclosure Statement and Plan.

II. Proofs of Claim, Bar Date Order, and the Debtors' Schedules

- 10. On May 25, 2023, the Court entered an order [Docket No. 35] appointing Kurtzman Carson Consultants LLC ("KCC") as claims and noticing agent in these chapter 11 cases. Among other things, KCC is authorized to (a) distribute required notices to parties in interest, (b) receive, maintain, docket, and otherwise administer the proofs of claim filed in the chapter 11 cases, and (c) provide such other administrative services.
- Order") providing that, except as otherwise provided therein, all persons or entities holding or wishing to assert a Claim, as defined in section 101(5) of the Bankruptcy Code, against the Debtors or their estates arising or accruing prior to the Petition Date, including a Claim arising under Bankruptcy Code section 503(b)(9), were required to file a completed and executed proof of such Claim so that it was actually received on or before 5:00 p.m. (prevailing Eastern Time) on the date (the "General Bar Date") that was thirty-five (35) days after the later of (i) the date the Debtors filed their schedules of assets and liabilities (the "Schedules") and (ii) the date of entry of the Bar Date Order. Paragraph 13 of the Bar Date Order provides "[a]ny person or entity holding an equity security (as defined in section 101(16) of the Bankruptcy Code, including, without limitation, common stock, preferred stock, warrants, or stock options) or other ownership interest in the Debtors . . . is not required to file a proof of interest on or before the applicable Bar Date."
- 12. On June 21, 2023, the Debtors filed their Schedules [Docket Nos. 129, 131, and 133]. Accordingly, the General Bar Date was established as July 26, 2023.

13. Notice of the General Bar Date was provided by mail and publication in accordance with the procedures outlines in the Bar Date Order.

RELIEF REQUESTED

- 14. By this Objection, the Debtors request the Court to enter the Proposed Order, disallowing and expunging the Disputed Claims, as indicated in further detail below and on Exhibit A to the Proposed Order. Further, pursuant to the Solicitation Procedures Order, the Debtors request that the Disputed Claims be disallowed for voting purposes.
- 15. In accordance with Local Rule 3007-1(e)(i)(E), the Debtors believe that this Objection complies in all material respects with Local Rule 3007-1.

OBJECTIONS TO DISPUTED CLAIMS

A. Equity-Based Claims

16. The Disputed Claims listed on Exhibit A to the Proposed Order (collectively, the "Equity-Based Claims") were filed by claimants asserting rights to a distribution in these chapter 11 cases based solely upon their status as equity security holders, and not because of any claim against the Debtors' estates. An equity interest in a debtor, such as stock, is not considered a "claim" under the Bankruptcy Code. See 11 U.S.C. § 101(5)(A) (defining a "claim" as a "right to payment" or a "right to an equitable remedy for a breach of performance"). Equity security holders are generally only entitled to a distribution in a bankruptcy case after all valid claims have been satisfied. See 11 U.S.C. § 1129(b)(2)(C)(i). The allowance of such Equity-Based Claims would unjustifiably elevate the position of equity security holders to that of creditors, to the detriment of legitimate creditors in these Chapter 11 Cases. Further, the Bar Date Order specifically provided that holders of equity claims were not required to file a proof of claim.

- 17. Additionally, several of the Equity-Based Claims also failed to attach any documentation and are not reflected as general unsecured claims in the Debtors' books and records.
- 18. Finally, the Equity-Based Claims should be disallowed for purposes of voting on the Combined Disclosure Statement and Plan. The Equity-Based Claims are not General Unsecured Claims (as defined in the Combined Disclosure Statement and Plan). Rather, as set forth above, they are claims based solely upon the claimant's status as an equity security holder. Therefore, it would be improper to allow the Equity-Based Claims to vote as General Unsecured Creditors.
- 19. Accordingly, the Debtors object to the Equity-Based Claims, and request entry of the Proposed Order disallowing and expunging each of the Equity-Based Claims, and disallowing the Disputed Claims for voting purposes.

RESPONSES TO THIS OBJECTION

20. Any responses to this Objection must be filed <u>on or before 4:00 p.m. (prevailing</u>

Eastern Time) on August 24, 2023, in accordance with the procedures set forth in the notice of this Objection.

RESERVATION OF RIGHTS

- 21. The Debtors reserve the right to adjourn the hearing on any Disputed Claim, and in the event that the Debtors do so, the Debtors will state the same in the agenda for the hearing on that Disputed Claim, which agenda will be served on the claimant.
- 22. The Debtors and their estates reserve any and all rights to amend, supplement or otherwise modify this Objection, the Proposed Order, or Exhibit A thereto and to file additional objections to any and all claims filed in these chapter 11 cases, including, without limitation, any and all of the Disputed Claims. The Debtors and their estates also reserve any and all rights, claims

and defenses with respect to any and all of the Disputed Claims, and nothing included in or omitted from this Objection, the Proposed Order, or Exhibit A thereto is intended or shall be deemed to impair, prejudice, waive or otherwise affect any rights, claims, or defenses of the Debtors and their estates with respect to the Disputed Claims.

NOTICE

23. Notice of this Motion has been provided to: (a) the Office of the United States Trustee for the District of Delaware (Attn: Richard L. Schepacarter); (b) counsel to the Committee; (c) counsel to the DIP Agent; (d) the Internal Revenue Service; (e) the Securities and Exchange Commission; (f) the Office of the United States Attorney for the District of Delaware; (g) claimants whose Disputed Claims are subject to this Objection; and (h) all parties who have filed a notice of appearance and request for service of papers pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

[Remainder of page intentionally left blank]

WHEREFORE the Debtors respectfully request entry of the Proposed Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: August 10, 2023 Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Jared W. Kochenash

Michael R. Nestor (No. 3526)
Matthew B. Lunn (No. 4119)
Joseph M. Mulvihill (No. 6061)
Jared W. Kochenash (No. 6557)
1000 North King Street
Rodney Square
Wilmington, Delaware 19801
Tel.: (302) 571-6600

Facsimile: (302) 571-1253
Email: mnestor@ycst.com
 mlunn@ycst.com
 jmulvihill@ycst.com
 jkochenash@ycst.com

Counsel for Debtors and Debtors in Possession

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:)
) Chapter 11
PLASTIQ INC., et al., ¹)
) Case No. 23-10671 (BLS)
Debtors.)
) (Jointly Administered)
)
	Hearing Date:
	September 14, 2023 at 10:00 a.m. (ET)
	Response Deadline:
) August 24, 2023 at 4:00 p.m. (ET)

NOTICE OF DEBTORS' FIRST (1ST) OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CLAIMS PURSUANT TO SECTION 502 OF THE BANKRUPTCY CODE, BANKRUPTCY RULE 3007 AND LOCAL RULE 3007-1

PARTIES RECEIVING THIS NOTICE SHOULD LOCATE THEIR NAMES AND THEIR DISPUTED CLAIMS IDENTIFIED ON EXHIBIT A TO THE PROPOSED ORDER

PLEASE TAKE NOTICE that the above-captioned debtors and debtors in possession (collectively, the "**Debtors**") have filed the attached *Debtors' First (1st) Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rule 3007-1 (the "Objection").²*

PLEASE TAKE FURTHER NOTICE that any responses (each, a "Response") to the relief requested in the Objection must be filed on or before August 24, 2023 at 4:00 p.m. (prevailing Eastern Time) (the "Response Deadline") with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801. At the same time, any party submitting a Response (each, a "Respondent") must serve a copy of its Response upon the undersigned counsel to the Debtors so as to be received on or before the Response Deadline.

PLEASE TAKE FURTHER NOTICE that any Response must contain, at a minimum, the following:

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Plastiq Inc. (6125), PLV Inc. d/b/a/ PLV TX Branch Inc. (5084), and Nearside Business Corp. (N/A). The corporate headquarters and the mailing address for the Debtors is 1475 Folsom Street, Suite 400, San Francisco, California 94103.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

- a. a caption setting forth the name of the Court, the above-referenced case number and the title of the Objection to which the Response is directed;
- b. the name of the Respondent and a description of the basis for the amount and classification asserted in the Disputed Claim, if applicable;
- c. a concise statement setting forth the reasons why the particular Disputed Claim should not be disallowed, reclassified or otherwise modified for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which the Respondent will rely in opposing the Objection at any hearing thereon;
- d. all documentation or other evidence of the particular Disputed Claim or asserted amount and classification thereof, to the extent not already included with the proof of claim previously filed, upon which the Respondent will rely in opposing the Objection at any hearing thereon; and
- e. the name, address, telephone number and email address of the person(s) (who may be the Respondent or a legal representative thereof) (i) possessing ultimate authority to reconcile, settle or otherwise resolve the Disputed Claim on behalf of the Respondent, and (ii) to whom the Debtors should serve any reply to the Response.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE OBJECTION WILL BE HELD ON <u>SEPTEMBER 14, 2023 AT 10:00 A.M. (prevailing Eastern Time)</u> BEFORE THE HONORABLE BRENDAN L. SHANNON IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 6TH FLOOR, COURTROOM NO. 1, WILMINGTON, DELAWARE 19801.

PLEASE TAKE FURTHER NOTICE THAT IF YOU ARE A CLAIMANT AND FAIL TO TIMELY FILE AND SERVE A RESPONSE IN ACCORDANCE WITH THE ABOVE REQUIREMENTS, YOU WILL BE DEEMED TO HAVE CONCURRED WITH AND CONSENTED TO THE OBJECTION AND THE RELIEF REQUESTED THEREIN, AND THE DEBTORS WILL PRESENT TO THE COURT, WITHOUT FURTHER NOTICE TO YOU, THE PROPOSED ORDER SUSTAINING THE OBJECTION.

PLEASE TAKE FURTHER NOTICE THAT QUESTIONS CONCERNING THE OBJECTION SHOULD BE DIRECTED TO THE UNDERSIGNED COUNSEL FOR THE DEBTORS. CLAIMANTS SHOULD NOT CONTACT THE CLERK OF THE COURT TO DISCUSS THE MERITS OF THEIR DISPUTED CLAIMS OR THE OBJECTION.

Dated: August 10, 2023 Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Jared W. Kochenash

Michael R. Nestor (No. 3526) Matthew B. Lunn (No. 4119) Joseph M. Mulvihill (No. 6061) Jared W. Kochenash (No. 6557) 1000 North King Street Rodney Square

Wilmington, Delaware 19801 Tel.: (302) 571-6600

Facsimile: (302) 571-1253
Email: mnestor@ycst.com
 mlunn@ycst.com
 jmulvihill@ycst.com
 jkochenash@ycst.com

Counsel for Debtors and Debtors in Possession

EXHIBIT 1

Canna Declaration

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:)
) Chapter 11
PLASTIQ INC., et al., 1))
) Case No. 23-10671 (BLS)
Debtors.)
) (Jointly Administered)
)
)

DECLARATION OF SCOTT CANNA IN SUPPORT OF DEBTORS' FIRST (1ST) OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CLAIMS PURSUANT TO SECTION 502 OF THE BANKRUPTCY CODE, BANKRUPTCY RULE 3007 AND LOCAL RULE 3007-1

I, Scott Canna, pursuant to 28 U.S.C. § 1746, declare:

1. I am a Director at Triple P RTS, LLC ("Portage Point") and the Deputy Chief Restructuring Officer of the above-captioned debtors and debtors-in-possession (collectively, the "Debtors"). I am become generally familiar with the Debtors' day to day operations, business affairs, and books and records, including, among other records, human resources and legal records that reflect, among other things, the Debtors' liabilities and the amount thereof owed to its creditors. I have read the Debtors' First (1st) Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rule 3007-1 (the "Objection"),² and am directly, or by and through other personnel or representatives of the Debtors, reasonably familiar with the information contained therein, the Proposed Order, and the

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Plastiq Inc. (6125), PLV Inc. d/b/a/ PLV TX Branch Inc. (5084), and Nearside Business Corp. (N/A). The corporate headquarters and the mailing address for the Debtors is 1475 Folsom Street, Suite 400, San Francisco, California 94103.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

Case 23-10671-BLS Doc 254-2 Filed 08/10/23 Page 3 of 3

exhibit attached to the Proposed Order, and the schedules attached thereto. I am authorized to

execute this declaration on behalf of the Debtors.

2. In preparing this Declaration I reviewed the claims register maintained by the

Debtors' court-appointed claims agent, KCC, which contains the record of all parties that filed

proofs of claim in connection with the Chapter 11 Cases. Additionally, I, or other employees of

Portage Point and/or the Debtors working with me or under my supervision, or the Debtors' other

advisors have reviewed each of the proofs of claim that is the subject to the Objection.

3. The information contained in Exhibit A to the Proposed Order is true and correct

to the best of my knowledge, information and belief.

4. Based upon a review of the claims register, the Debtors have determined that the

Equity-Based Claims listed on Exhibit A to the Proposed Order have been filed by shareholders

and are based upon their ownership of Debtors' stock. Accordingly, to prevent the claimants from

potentially receiving an unwarranted recovery from the Debtors' estates, the Debtors seek to

disallow and expunge the Equity-Based Claims.

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

to the best of my knowledge, information and belief.

Executed on August 10, 2023

/s/ Scott Canna

Scott Canna

Deputy Chief Restructuring Officer

30647668.2

2

EXHIBIT 2

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

) Re: Docket No
) (Jointly Administered)
Debtors.) Case No. 23-10671 (BLS)
PLASTIQ INC., et al.,1)
In re:) Chapter 11

ORDER SUSTAINING DEBTORS' FIRST (1ST) OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CLAIMS PURSUANT TO SECTION 502 OF THE BANKRUPTCY CODE, BANKRUPTCY RULE 3007 AND LOCAL RULE 3007-1

Upon consideration of the *Debtors' First (1st) Omnibus (Non-Substantive) Objection to Claims Pursuant to Section 502 of the Bankruptcy Code, Bankruptcy Rule 3007 and Local Rule 3007-1* (the "**Objection**")² and the Canna Declaration; and it appearing that this Court has jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order; and it appearing that venue of these Chapter 11 Cases and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that this matter is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having determined that the relief requested in the Objection is in the best interests of the Debtors, their estates, their creditors and other parties in interest; and it appearing that notice of the Objection was good and sufficient upon the particular circumstances and that no other or further notice need be given; and upon the record herein; and after due deliberation thereon and good and sufficient cause appearing therefor; it is hereby

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Plastiq Inc. (6125), PLV Inc. d/b/a/ PLV TX Branch Inc. (5084), and Nearside Business Corp. (N/A). The corporate headquarters and the mailing address for the Debtors is 1475 Folsom Street, Suite 400, San Francisco, California 94103.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

ORDERED, ADJUDGED, AND DECREED THAT:

- 1. The Objection is SUSTAINED, as set forth herein.
- 2. The Equity-Based Claims identified on Exhibit A to this Order are hereby disallowed and expunged.
- 3. The Equity-Based Claims identified on Exhibit A to this Order are disallowed for purposes of voting on the Combined Disclosure Statement and Plan.
- 4. The Debtors' objection to each Disputed Claim addressed in the Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate Order with respect to each claim. Any stay of this Order pending appeal by any of the claimants subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters covered hereby.
- 5. Any and all rights of the Debtors and their estates to amend, supplement, or otherwise modify the Objection and to file additional objections to any and all claims filed in these Chapter 11 Cases, including, without limitation, any and all of the Disputed Claims, shall be reserved. Any and all rights, claims and defenses of the Debtors and their estates with respect to any and all of the Disputed Claims shall be reserved, and nothing included in or omitted from the Objection is intended or shall be deemed to impair, prejudice, waive or otherwise affect any rights, claims, or defenses of the Debtors and their estates with respect to the Disputed Claims.

6. This Court shall retain jurisdiction over any and all affected parties with respect to any and all matters, claims or rights arising from or related to the implementation or interpretation of this Order.

$\underline{\textbf{EXHIBIT } \textbf{A}^1}$

Equity-Based Claims

Capitalized terms used but not otherwise defined on Exhibit A shall have the meanings ascribed to such terms in the Objection.

Case 23-10671-BLS Doc 254-3 Filed 08/10/23 Page 6 of 7

Language Case Number: 23-10671

Exhibit A - Equity Based Claims

Name	Date Filed	Case #	Debtor	Claim #	Clair	m Amount
1 Khosla Ventures VI, LP Address on File	6/7/2023	23-10671	Plastiq Inc.	2	\$	923,054
Reason: Proof of claim is on accoun	t of an interest, rather tha	an a claim, as defined i	n Bankruptcy Rule 30007	′(d)(7).		
2 Khosla Ventures Seed B, LP Address on File	6/7/2023	23-10671	Plastiq Inc.	3	\$	7,286,392.
Reason: Proof of claim is on accoun	t of an interest, rather tha	an a claim, as defined i	n Bankruptcy Rule 30007	′(d)(7).		
3 Khosla Ventures Seed B CF, LP Address on File	6/7/2023	23-10671	Plastiq Inc.	4	\$	413,606
Reason: Proof of claim is on accoun	t of an interest, rather tha	an a claim, as defined i	n Bankruptcy Rule 30007	'(d)(7).		
4 Maria Isabel Vega Address on File	6/28/2023	23-10671	Plastiq Inc.	22	\$	26,079
Reason: Proof of claim is on accoun	t of an interest, rather tha	an a claim, as defined i	n Bankruptcy Rule 30007	′(d)(7).		
5 Brett Rome Address on File Reason: Proof of claim is on accoun documentation and is not reflected a				32 (d)(7). Additionally, the	\$ e claim failed t	10,000 to attach any
6 Rebecca Ramya Sekar Address on File	6/30/2023	23-10671	Plastiq Inc.	34	\$	26,812
Reason: Proof of claim is on accoun	t of an interest, rather tha	an a claim, as defined i	n Bankruptcy Rule 30007	′(d)(7).		
7 Soumya Badam Address on File	7/8/2023	23-10671	Plastiq Inc.	41	a claim failed	Undetermine
Reason: Proof of claim is on accoun documentation and is not reflected a				(u)(1). Additionally, the	, ciaiiii lailed l	o allacii ariy
8 Luong Phung Address on File	7/9/2023	23-10671	Plastiq Inc.	42	\$	19,026
Reason: Proof of claim is on accoun	t of an interest, rather tha	an a claim, as defined i	n Bankruptcy Rule 30007	′(d)(7).		
9 Atlas Venture Fund VIII, L.P. Address on File	7/11/2023	23-10671	Plastiq Inc.	44	\$	8,285,000
Reason: Proof of claim is on accoun	t of an interest, rather tha	an a claim, as defined i	n Bankruptcy Rule 30007	′(d)(7).		
0 Accomplice Fund II, L.P. Address on File	7/11/2023	23-10671	Plastiq Inc.	45	\$	3,999,992
Reason: Proof of claim is on accoun	t of an interest, rather tha	an a claim, as defined i	n Bankruptcy Rule 30007	′(d)(7).		
1 Accomplice Fund I, L.P. Address on File	7/11/2023	23-10671	Plastiq Inc.	46	\$	2,999,999
Reason: Proof of claim is on accoun	t of an interest, rather tha	an a claim, as defined i	n Bankruptcy Rule 30007	′(d)(7).		
2 Accomplice Fortuity Pool, L.P. Address on File	7/11/2023	23-10671	Plastiq Inc.	47	\$	6,199,990
Reason: Proof of claim is on accoun	t of an interest, rather tha	an a claim, as defined i	n Bankruptcy Rule 30007	′(d)(7).		
3 Tom Brown Address on File Reason: Proof of claim is on accoun	7/12/2023	23-10671	Plastiq Inc.	51	a claim failed	Undetermin
documentation and is not reflected a				(d)(1). Additionally, the	; ciaiiii iaileu i	.o attach any
4 TriplePoint Ventures IV LLC	7/13/2023	23-10671	Plastiq Inc.	53	\$	99,999
Address on File Reason: Proof of claim is on accoun documentation and is not reflected a				(d)(7). Additionally, the	e claim failed t	to attach any
5 Accomplice Plastiq Investors, LLC Address on File	7/14/2023	23-10671	Plastiq Inc.	57	\$	999,996
Reason: Proof of claim is on accoun	t of an interest, rather tha	an a claim, as defined i	n Bankruptcy Rule 30007	′(d)(7).		
6 Accomplice Plastiq Investors II, LLC Address on File	7/14/2023	23-10671	Plastiq Inc.	58	\$	1,999,998
Reason: Proof of claim is on accoun	t of an interest, rather tha	an a claim, as defined i	n Bankruptcy Rule 30007	′(d)(7).		
7 Kimberly Dasse Address on File	7/17/2023	23-10671	Plastiq Inc.	59	\$	45,660
Reason: Proof of claim is on accoun	t of an interest, rather tha	an a claim, as defined i	n Bankruptcy Rule 30007	′(d)(7).		
8 Richard Firth Address on File	7/17/2023	23-10671	Plastiq Inc.	60	\$	8,812
Reason: Proof of claim is on accoun 9 Vishakha Gupta Address on File	t of an interest, rather the 7/16/2023	an a claim, as defined i 23-10671	n Bankruptcy Rule 30007 Plastiq Inc.	′(d)(7). 61	\$	52,371
Address on File						
Reason: Proof of claim is on accoun	t of an interest, rather tha	an a claim, as defined i	n Bankruptcy Rule 30007	′(d)(7).		

Case 23-10671-BLS Doc 254-3 Filed 08/10/23 Page 7 of 7

In re: Plastiq Inc., et al.
Case Number: 23-10671
Exhibit A - Equity Based Claims

Name	Date Filed	Case #	Debtor	Claim #	Clair	n Amount
21 TTCP Co-Investment Overage Fund IX, Address on File	L.F7/19/2023	23-10671	Plastiq Inc.	63	\$	1,999,998.36
Reason: Proof of claim is on account of a	an interest, rather th	an a claim, as defined ir	Bankruptcy Rule 30007	7(d)(7).		
22 Top Tier Venture Capital VIII Holdings Address on File	7/19/2023	23-10671	Plastiq Inc.	64	\$	5,496,163.00
Reason: Proof of claim is on account of a	an interest, rather th	an a claim, as defined ir	Bankruptcy Rule 30007	7(d)(7).		
23 Top Tier Venture Velocity Fund 2, L.P. Address on File	7/19/2023	23-10671	Plastiq Inc.	65	\$	11,503,731.00
Reason: Proof of claim is on account of a	an interest, rather th	an a claim, as defined ir	Bankruptcy Rule 30007	7(d)(7).		
24 TTBSP, L.P Opportunity Series Address on File	7/19/2023	23-10671	Plastiq Inc.	66	\$	3,499,931.00
Reason: Proof of claim is on account of a	an interest, rather th	an a claim, as defined ir	Bankruptcy Rule 30007	7(d)(7).		
25 TTCP NMERB SMA, L.P. Address on File	7/19/2023	23-10671	Plastiq Inc.	67	\$	2,418,835.00
Reason: Proof of claim is on account of a	an interest, rather th	an a claim, as defined ir	Bankruptcy Rule 30007	7(d)(7).		
26 Sriram Krishnamurthy Address on File	7/24/2023	23-10671	Plastiq Inc.	70	\$	15,854.00
Reason: Proof of claim is on account of a	an interest rather th	an a claim as defined in	Bankruntov Rule 30007	7(d)(7)		
27 Gopibahen Harishkumar Pandya Address on File	7/23/2023	23-10671	Plastiq Inc.	71	\$	51,475.11
Reason: Proof of claim is on account of a	an interest, rather th	an a claim, as defined ir	Bankruptcv Rule 30007	7(d)(7).		
28 Boya Zhang Address on File	7/22/2023	23-10671	Plastiq Inc.	72	\$	3,096.00
Reason: Proof of claim is on account of a	an interest rather th	an a claim as defined in	Bankruptcy Rule 30007	7(d)(7)		
29 Gopi Pandya Address on File	7/23/2023	23-10671	Plastiq Inc.	73	\$	51,475.11
Reason: Proof of claim is on account of a	an interest rather th	an a claim as defined in	Bankruptcy Rule 30007	7(d)(7)		
30 Qian Qiao Address on File	7/24/2023	23-10671	Plastiq Inc.	74	\$	21,500.00
Reason: Proof of claim is on account of a	an interest rather th	an a claim as defined in	Bankruntov Rule 30007	7(d)(7)		
31 Kiran Padmanabhuni Address on File	7/29/2023	23-10671	Plastiq Inc.	87	\$	29,327.76
Reason: Proof of claim is on account of a documentation and is not reflected as a			' '	7(d)(7). Additionally, the	e claim failed t	o attach any
32 K. DANIEL RIEW and MARY RIEW, Tru Address on File	ste 7/28/2023	23-10671	Plastiq Inc.	88	\$	50,000.00
Reason: Proof of claim is on account of a	an interest, rather th	an a claim, as defined ir	Bankruptcy Rule 30007	7(d)(7).		
33 HG 2009 Family Trust u/a/d 12/30/2009 Address on File Reason: Proof of claim is on account of a documentation and is not reflected as a	8/1/2023 an interest, rather th	23-10671 an a claim, as defined ir	Plastiq Inc. Bankruptcy Rule 30007	89	\$ e claim failed t	400,000.00 o attach any