Docket #0643 Date Filed: 11/25/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: RELIZ TECHNOLOGY GROUP HOLDINGS INC., *et al*, Debtors.	Chapter 11 Case No. 26-10371 (TMH) (Jointly Administered)
RELIZ TECHNOLOGY GROUP HOLDINGS INC., et al., Plaintiffs, v. 1548199 ALBERTA LTD. and ROBERT J. BERTRAM, Defendants.	Adv. Pro. No. 26-50224 (TMH) **RE: D.I. 632** **RE: Adv D.I. 38**

CERTIFICATE OF NO OBJECTION FOR GELLERT SEITZ BUSENKELL & BROWN, LLC'S MOTION TO WITHDRAW AS COUNSEL FOR 1548199 ALBERTA LTD. AND ROBERT J. BERTRAM

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection or other responsive pleading to *Gellert Seitz Busenkell & Brown, LLC's Motion to Withdraw as Counsel for 1548199 Alberta Ltd. and Robert J. Bertram* (the "Motion") [D.I. 632], which was filed on November 10, 2026. The undersigned further certifies that he has reviewed the Court's docket in this case and no answer, objection or other responsive pleadings to the Motion appears thereon. Pursuant to the Notice filed with the Motion, objections to the Motion were to be filed and served no later than 4:00 p.m. (EDST) on November 24, 2026.

It is hereby respectfully requested that the Order attached to the Motion, which is reattached hereto as Exhibit A, be entered at the earliest convenience of the Court.



Dated: November 25, 2026 GELLERT SEITZ BUSENKELL & BROWN, LLC

/s/ Michael Busenkell

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EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: RELIZ TECHNOLOGY GROUP HOLDINGS INC., *et al*, Debtors.	Chapter 11 Case No. 26-10371 (TMH) (Jointly Administered)
RELIZ TECHNOLOGY GROUP HOLDINGS INC., et al., Plaintiffs, v. 1548199 ALBERTA LTD. and ROBERT J. BERTRAM, Defendants.	Adv. Pro. No. 26-50224 (TMH)

ORDER GRANTING GELLERT SEITZ BUSENKELL & BROWN, LLC'S MOTION TO WITHDRAW AS COUNSEL FOR 1548199 ALBERTA LTD. AND ROBERT J. BERTRAM

Upon consideration of *Gellert Seitz Busenkell & Brown, LLC's Motion to Withdraw as Counsel for 1548199 Alberta Ltd. and Robert J. Bertram* (the "Motion") filed by Gellert Seitz Busenkell & Brown, LLC, and any responses thereto, and the Court finding that (a) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (b) this matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); it is hereby ORDERED that:

1. The Motion is GRANTED.

2. Gellert Seitz Busenkell & Brown, LLC. and all attorneys at the firm who entered appearance on behalf of 1548199 Alberta Ltd. and Robert J. Bertram in this case are hereby authorized to withdraw as counsel of record.

3. The Clerk of Court is directed to remove Gellert Seitz Busenkell & Brown, LLC and its attorneys from the service list and all applicable electronic notice systems in this case as counsel for 1548199 Alberta Ltd. and Robert J. Bertram.

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