Docket #0247 Date Filed: 04/27/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
RELIZ TECHNOLOGY GROUP HOLDINGS INC., *et al.*,[1]	Case No. 26-10371 (TMH)
	(Jointly Administered)
Debtors.	**Related to Docket Nos. 16, 17, 62, 119, 225, 228, 241, 242**

CERTIFICATION OF COUNSEL REGARDING ENTRY OF FOURTH INTERIM ORDER (I) AUTHORIZING POSTPETITION USE OF CASH COLLATERAL; (II) GRANTING ADEQUATE PROTECTION TO THE PREPETITION SECURED PARTY; (III) SCHEDULING A FINAL HEARING; AND (IV) GRANTING RELATED RELIEF

The undersigned, proposed counsel to the debtors and debtors in possession (collectively, the "Debtors") in the above-captioned chapter 11 cases, hereby certifies as follows:

1. On March 16, 2026, the Debtors filed the *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief* [Docket No. 16] (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court").

2. On March 18, 2026, the Court entered the *Interim Order (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief* [Docket No. 62] (the "First Interim Order").

[1] The Debtors in these chapter 11 cases, along with the last four digits of their respective federal tax identification numbers, are: Reliz Technology Group Holdings Inc. (6265); Reliz Technologies LLC (1968); Reliz LTD (N/A); and Reliz CI LTD (N/A). The Debtors' service address is 401 West Ontario St., Suite 400, Chicago, IL 60654.

3. On March 30, 2026, the Court entered the *Second Interim Order (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief* [Docket No. 119] (the "Second Interim Order").

4. On April 17, 2026, (i) the Court entered the *Third Interim Order (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief* [Docket No. 225] (the "Third Interim Order") and (ii) such order was served on all parties entitled to notice pursuant to Del. Bankr. L.R. 2002-1(b).

5. On April 20, 2026, the Debtors filed and served the *Notice of Entry of Third Interim Order and Fourth Interim Hearing with Respect to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral; (II) Granting Adequate Protection to the Prepetition Secured Party; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief* [Docket No. 228] (the "Notice"), which Notice attached a proposed fourth interim cash collateral order (the "Proposed Fourth Interim Order") and required that objections to entry of such order be filed on or before April 24, 2026, at 11:59 p.m. (the "Objection Deadline").

6. Prior to the Objection Deadline, objections [Docket Nos. 241, 242] (together, the "Objections") to entry of the Proposed Fourth Interim Order were filed by the Official Committee of Unsecured Creditors (the "Committee") and Artha Investment Partners LLC ("Artha"). The Objection Deadline has now passed, and no additional objections to entry of the Proposed Fourth Interim Order appear on the docket or were served upon undersigned counsel.

7. The Debtors negotiated in good faith with the Committee, Artha, and Celsius Network Ltd. ("Celsius") to resolve the Objections, and these parties have agreed to entry of a

revised form of cash collateral order (the "Revised Proposed Fourth Interim Order").[2] The Debtors also circulated the Revised Proposed Fourth Interim Order to the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee"), and the U.S. Trustee is taking no position regarding entry of the Revised Proposed Fourth Interim Order.

8. A copy of the Revised Proposed Fourth Interim Order is attached hereto as **Exhibit A**, and a redline version of the Revised Proposed Fourth Interim Order reflecting all changes from the Proposed Fourth Interim Order filed in connection with the Notice is attached hereto as **Exhibit B**.

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[2] The Debtors have agreed that the Objections raised by the Committee and Artha are reserved for any subsequent interim or final hearing on the Debtors' cash collateral motion.

9. Accordingly, the Debtors respectfully request that the Court enter the Revised Proposed Fourth Interim Order attached hereto as **Exhibit A** at the convenience of the Court.

Dated: April 27, 2026
Wilmington, Delaware

MCDERMOTT WILL & SCHULTE LLP

/s/ David R. Hurst

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Proposed Counsel for Debtors
and Debtors in Possession

EXHIBIT A

Revised Proposed Fourth Interim Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: RELIZ TECHNOLOGY GROUP HOLDINGS INC., *et al.*,[1] Debtors.	Chapter 11 Case No. 26-10371 (TMH) (Jointly Administered) **Related to Docket Nos. 16, 17, 62, 119, 182, 185, 225, 241, 242**

FOURTH INTERIM ORDER (I) AUTHORIZING POSTPETITION USE OF CASH COLLATERAL; (II) GRANTING ADEQUATE PROTECTION TO THE PREPETITION SECURED PARTY; (III) SCHEDULING A FINAL HEARING; AND (IV) GRANTING RELATED RELIEF

Upon the motion (the "Motion")[2] of the Debtors for entry of an interim order (this "Fourth Interim Order") and a Final Order (i) authorizing the use of Cash Collateral, (ii) granting adequate protection to the Prepetition Secured Party, (iii) scheduling a final hearing pursuant to Bankruptcy Rules 4001(b) and (d), and (iv) granting related relief, all as more fully set forth in the Motion; and upon consideration of the First Day Declaration; and the Court having jurisdiction over this matter 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 February 29, 2012; and the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and notice of the Motion having been given in accordance with the Local Rules; and

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[1] The Debtors in these chapter 11 cases, along with the last four digits of their respective federal tax identification numbers, are: Reliz Technology Group Holdings Inc. (6265); Reliz Technologies LLC (1968); Reliz LTD (N/A); and Reliz CI LTD (N/A). The Debtors' service address is 401 West Ontario St., Suite 400, Chicago, IL 60654.

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

it appearing that no other or further notice is necessary; and it appearing that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and after due deliberation thereon; and good and sufficient cause appearing therefor;

THE COURT HEREBY FINDS AND DETERMINES:[3]

A. Petition Date. On March 15, 2026 (the "Petition Date"), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with this Court.

B. Debtors in Possession. The Debtors are continuing to manage and operate their businesses and property as debtors and debtors in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. No request for the appointment of a trustee or examiner has been made in the Chapter 11 Cases. On March 27, 2026, the United States Trustee for the District of Delaware appointed an official committee of unsecured creditors (the "Committee"). *See* Docket No. 104.

C. Jurisdiction and Venue. The Court has jurisdiction to consider the Motion and the relief requested therein in accordance with 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 Court may enter a final order consistent with Article III of the United States Constitution. This is a core proceeding under 28 U.S.C. § 157(b). Venue of this proceeding and the Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

D. Notice. Notice of the Motion and the hearing thereon was provided pursuant to Bankruptcy Rules 2002, 4001(b) and (d), and 9006 and Local Rule 4001-2, as required by sections 361 and 363 of the Bankruptcy Code and the Local Rules. Except as provided herein with respect to notice of the final hearing on the Motion and the Final Order, no further notice of, or hearing on, the relief sought in the Motion is necessary or required. The Debtors have represented

[3] To the extent any findings of fact constitute conclusions of law, they are adopted as such, and vice versa.

that notice of the Motion has been provided by the Debtors to: (a) the U.S. Trustee; (b) the Internal Revenue Service; (c) the Securities and Exchange Commission; (d) the United States Attorney for the District of Delaware; (e) the parties included on the Debtors' list of its 30 largest unsecured creditors; (f) the Prepetition Secured Party; (g) proposed counsel to the Official Committee of Unsecured Creditors (the "Committee"), Morris James LLP 3205 Ave N Blvd, Suite 100, Wilmington, DE 19803 (Attn: Eric J. Monzo (emonzo@morrisjames.com) and Tara C. Pakrouh (tpakrouh@morrisjames.com); and (h) all parties entitled to notice pursuant to Local Rules 2002-1(b) and 9013-1(m) (the "Notice Parties").

E. Necessity of Relief Requested. Good cause has been shown for the entry of this Fourth Interim Order. The Debtors have an immediate need to use Cash Collateral, to, among other things, fund the orderly continuation of their business, maintain the confidence of their customers and vendors, pay their operating expenses, and preserve their going-concern value. In the absence of the availability of such liquidity in accordance with the terms hereof, the continued operation of the Debtors' business and the funding of the administrative costs of the estate would not be possible, and serious and irreparable harm to the Debtors, their estates, and their creditors would occur. The terms for the Debtors' use of Cash Collateral pursuant to this Fourth Interim Order are fair and reasonable, reflect the Debtors' exercise of prudent business judgment consistent with their fiduciary duties, and constitute reasonably equivalent value and fair consideration. The Debtors have requested entry of this Fourth Interim Order pursuant to Bankruptcy Rule 4001(b)(2) and (d). Absent granting the relief sought by this Fourth Interim Order, the Debtors' estates would be immediately and irreparably harmed. The use of Cash Collateral in accordance with this Fourth Interim Order is therefore in the best interest of the Debtors and their estates, their creditors, and other parties in interest.

F. Adequate Protection of Prepetition Secured Party. In connection with the use of Cash Collateral, the Prepetition Secured Party is entitled to adequate protection of its interests in its Cash Collateral pursuant to sections 361, 363(c)(2) and 363(c) of the Bankruptcy Code to the extent set forth in this Fourth Interim Order. As adequate protection, the Prepetition Secured Party will receive the adequate protection described in paragraphs 4, 5 and 6 of this Fourth Interim Order.

Based upon the foregoing findings and conclusions, the Motion, and the record before this Court with respect to the Motion, and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED AND ADJUDGED that:

1. Motion Granted. The Motion is GRANTED on an interim basis, and the use of Cash Collateral is authorized on an interim basis, in accordance with the terms and conditions set forth in this Fourth Interim Order.

2. Objections to Entry of Fourth Interim Order Overruled. All objections to the entry of this Fourth Interim Order, to the extent not withdrawn, waived, or resolved, are hereby denied and overruled.

3. Authorization to Use Cash Collateral. Subject to the terms and conditions of this Fourth Interim Order, the Debtors are authorized to use the Cash Collateral during the period (the "Interim Period") from the Petition Date through and including the occurrence of the Termination Date (as defined below), *provided that*, the Debtors' use of Cash Collateral shall not exceed $12,500,000.00 during the Interim Period (the "Interim Amount"), *provided further that*, the Debtors may exceed the Interim Amount with the consent of (i) the Prepetition Secured Party and (ii) the Ad Hoc Group of BlockFills Clients, 1548199 Alberta Ltd., Robert J. Bertram, the Richard E. Ward Revocable Trust, and Artha Investment Partners LLC; and (iii) the Committee (collectively, the "Consent Parties"), or further order of the Court.

4. Prepetition Secured Party's Adequate Protection. As adequate protection for the Debtors' use of the Cash Collateral, the Prepetition Secured Party is granted and solely to the extent of (a) the postpetition diminution in value of such Prepetition Secured Party's interest in the Cash Collateral resulting from the use, sale, or lease by the Debtors of the Cash Collateral and the imposition or enforcement of the automatic stay pursuant to section 362(a) of the Bankruptcy Code and (b) any valid and enforceable prepetition liens in favor of such Prepetition Secured Party:

a. valid and perfected replacement security interests in and liens (the "Adequate Protection Liens") upon the Debtors' assets and properties (whether existing on the Petition Date or arising or acquired thereafter), including the Prepetition Collateral, and any proceeds thereof (collectively, the "Replacement Collateral"),[4] in each case subject only to any valid, enforceable, and perfected senior liens on the Prepetition Collateral in existence as of the Petition Date (collectively, the "Prior Senior Liens"); *provided*, except as otherwise provided in the Final Order, the Replacement Collateral shall not include any claims or causes of action arising under chapter 5 of the Bankruptcy Code (the "Avoidance Actions"), including any proceeds of such Avoidance Actions,

b. a superpriority administrative claim (the "Adequate Protection Superpriority Claim") against the Debtors' estates, as and to the extent provided in section 507(b) of the Bankruptcy Code.

5. Reporting. As further adequate protection, the Debtors shall provide the Prepetition Secured Party and the Consent Parties and their respective professionals with the following reports:

[4] The Committee expressly reserves all rights related to whether digital assets currently held by the Debtors is property of the Debtors' estates.

a. beginning no later than April 6, 2026, on Monday of each week (or the immediately succeeding business day, if such Monday is not a business day), a report of cash and cryptocurrency on hand as of the close of business on the immediately preceding Friday, which shall indicate (i) the amount and type of each cryptocurrency, (ii) the fair market value of the Debtors' holdings of each such cryptocurrency on such date, and (iii) the amount of cash or other assets received in exchange for any cryptocurrency sold or transferred during the prior week;

b. beginning no later than April 6, 2026, on Monday of each week (or the immediately succeeding business day, if such Monday is not a business day), a report on any sale or other disposition of assets other than cryptocurrency ("Non-Crypto Assets") during the prior week or the entry by any Debtor into an agreement to sell or otherwise dispose of any Non-Crypto Assets;

c. beginning no later than April 6, 2026, on Monday of each week (or the immediately succeeding business day, if such Monday is not a business day), a report on any Intercompany Transactions[5] exceeding $100,000 during the prior week (other than ordinary course funding of payroll), including, for each transfer, the name of the transferor, the name of the transferee and the date and amount of the transfer; and

d. beginning no later than April 6, 2026, every other Monday (or the immediately succeeding business day, if such Monday is not a business day), a report on any

[5] "Intercompany Transaction" has the meaning ascribed to such term in the *Interim Order (I) Authorizing Debtors to (A) Continue to Operate their Cash Management System and (B) Maintain Existing Bankr Accounts and Business forms and Honor Certain Prepetition Obligations Related Thereto; (II) Authorizing the Debtors to (A) Continue to Perform Intercompany Transactions and (B) Granting Administrative Expense Status for Postpetition Intercompany Claims; (III) Extending the Time for the Debtors to Comply with Requirements Set Forth in 11 U.S.C. § 345(b); and (IV) Granting Related Relief* [Docket No. 75].

pending or threatened litigation asserting ownership of or seeking the segregation of, or imposition of a lien or trust on, any cash or cryptocurrency held by the Debtors or any proceeds thereof.

6. Proceeds of Non-Crypto Assets. As further adequate protection, the Debtors shall segregate the proceeds of all Non-Crypto Assets, including, without limitation, proceeds from collections of Non-Crypto Assets (*e.g.*, receivables and other payment intangibles) and proceeds from the sale or other disposition of any Non-Crypto Assets in a separate account, which shall not be disbursed from the separate account absent adjudication by this Court.

7. Modification of Automatic Stay. The automatic stay under Bankruptcy Code section 362(a) is hereby modified as necessary to effectuate all of the terms and provisions of this Fourth Interim Order, including, without limitation, to: (a) permit the Debtors to grant the Adequate Protection Liens and the Adequate Protection Superpriority Claim; (b) permit the Prepetition Secured Party to perform such acts to assure the perfection and priority of the liens granted herein; and (c) permit the Debtors to make any payments authorized to be made in accordance with the terms of this Fourth Interim Order.

8. Perfection of Adequate Protection Liens. This Fourth Interim Order shall be sufficient and conclusive evidence of the validity, perfection, and priority of the security interests and liens granted under this Fourth Interim Order, without the necessity of filing or recording any mortgage, financing statement, or other instrument or document which may otherwise be required under the law or regulation of any jurisdiction or the taking of any other action to validate or perfect (in accordance with applicable non-bankruptcy law) the security interests and liens granted herein, or to entitle the Prepetition Secured Party to the priorities granted herein. Notwithstanding the foregoing, the Prepetition Secured Party may file such financing statements, mortgages, deeds of trust, notices of lien, or similar instruments or otherwise confirm perfection of such liens, security

interests, and mortgages without seeking modification of the automatic stay under section 362 of the Bankruptcy Code and all such documents shall be deemed to have been filed or recorded at the time of and on the applicable Petition Date. The Prepetition Secured Party may, in its discretion, file a photocopy of this Fourth Interim Order as a financing statement with any recording officer designated to file financing statements or with any registry of deeds or similar office in any jurisdiction in which any Debtor has real or personal property and, in such event, the subject filing or recording officer shall be authorized to file or record such copy of this Fourth Interim Order. For the avoidance of doubt, nothing in this Fourth Interim Order shall constitute a finding of fact or conclusion of law regarding the existence, validity, amount, or perfection of any debt(s) owed to or lien(s) or other interest(s) granted in favor of the Prepetition Secured Party, and the rights of all parties-in-interest, including without limitation the Committee and any chapter 7 or 11 trustee appointed or elected in these cases, to challenge the existence, validity, amount, and perfection of any debt(s) owed to or lien(s) or other interest(s) granted in favor of the Prepetition Secured Party are fully reserved. In the event of a successful challenge, the court can fashion an appropriate remedy.

9. Professional Fee Escrow. The fees and expenses of the Debtors' professionals (the "Debtor Professionals") and the Committee's professionals (the "Committee Professionals" and, together with the Debtor Professionals, the "Professionals") shall be set aside weekly based on the actual accruals of the Professionals' incurred fees and expenses from the prior week and held by the Debtor in a segregated account for the sole benefit of the Professionals (the "Professional Fee Escrow"). For the avoidance of doubt, during the Interim Period, the amount in the Professional Fee Escrow, together with all of the Debtors' other uses of Cash Collateral during the Interim Period, shall not exceed the Interim Amount. The amount paid by the Debtor in any month for the

fees and expenses of the Professionals shall only be paid after consultation with the Committee and upon allowance or authorization by this Court from funds on deposit in the Professional Fee Escrow. In addition, until such time as this Court considers the fees and expenses of the Professionals on a final basis, the Debtor Professionals and Committee Professionals shall only be entitled to satisfy their fees from the amounts allocated to each. When this Court considers the fees and expenses of the Professionals on a final basis, to the extent there are funds allocated to either the Debtor Professionals or the Committee Professionals in excess of what is needed to satisfy the remaining fees and expenses owed to either group of Professionals, those excess funds may be used to satisfy the fees and expenses of any Professional. For the avoidance of doubt, payment of the Professionals' fees and expenses are not limited solely to funds held in the Professional Fee Escrow.

10. Termination Date. The Debtors' right to use Cash Collateral shall terminate on the earliest to occur of the following (a "Termination Date"): (x) 11:59 p.m., New York City time, on April 29, 2026, (y) 11:59 p.m., New York City time, on the date of the final hearing, unless a Final Order is entered extending the Debtors' right to use Cash Collateral; and (z) the date upon which the Court issues an order following notice and a hearing providing for the termination of the further use of Cash Collateral due to the failure by the Debtors to comply with the materials terms, covenants, and conditions of this Fourth Interim Order.

11. Rights of the Prepetition Secured Party. Nothing in this Fourth Interim Order shall be deemed or construed to limit the Prepetition Secured Party's rights to seek other or further adequate protection. Without limiting the foregoing, upon the occurrence of a Trigger Event (as defined below), the Prepetition Secured Party shall be entitled to an emergency hearing on a motion for additional adequate protection within three business days after the filing of such a motion,

subject to the Court's availability. For purposes of this Fourth Interim Order, the term "Trigger Event" means when the fair market value of cash and cryptocurrency in the Debtors' possession *minus* the Interim Amount and the Contested Amount (as defined below) is equal to or less than $10,000,000.00. "Contested Amount" means the value of any of the Debtors' cash or cryptocurrency that is subject to an order of any court of competent jurisdiction that either (A) finds that cryptocurrency held by the Debtors or the proceeds thereof is not property of the estate, (B) grants the segregation of, or imposition of a lien or trust on, cash or cryptocurrency held by the Debtors or any proceeds thereof, or (C) restrains or enjoins the Debtors' use of cash or cryptocurrency in their possession for any reason.

12. Reservation of Rights. Notwithstanding anything herein or in the Motion to the contrary herein, the Debtors reserve all of their rights and nothing herein or in the Motion shall prejudice the Debtors' ability, to (a) seek any further use of Cash Collateral (including on a non-consensual basis) on any terms and conditions, (b) to the extent that any cash payment made to the Prepetition Secured Party as adequate protection is not allowed under section 506(b) of the Bankruptcy Code, seek to recharacterize and apply such payment toward principal owed under the Promissory Notes, (c) seek marshalling with respect to the Promissory Notes, (d) seek relief under section 552(b) of the Bankruptcy Code, or (e) dispute any claim or lien on any grounds. The rights of all parties in interest (including the Prepetition Secured Party) with respect to any request to use Cash Collateral, the validity, extent, and priority of any claims, and any purported liens securing such claims are reserved in all respects.

13. Miscellaneous.

a. Binding Effect of Fourth Interim Order. The provisions of this Fourth Interim Order, including all findings herein, shall be binding upon all parties in interest in the

Chapter 11 Cases, including, without limitation, the Prepetition Secured Party, the Debtors, and their respective successors and assigns (including any trustee hereinafter appointed or elected for the estate of any Debtor, an examiner appointed pursuant to section 1104 of the Bankruptcy Code, or any other fiduciary appointed as a legal representative of the Debtors or with respect to the property of the estate of any of the Debtors).

b. Headings. The headings in this Fourth Interim Order are for purposes of reference only and shall not limit or otherwise affect the meaning of this Fourth Interim Order.

c. Effect of this Fourth Interim Order. This Fourth Interim Order shall constitute findings of fact and conclusions of law pursuant to Bankruptcy Rule 7052.

d. No Third Party Rights. Except as explicitly provided for herein, this Fourth Interim Order does not create any rights for the benefit of any third party, creditor, equity holder or any direct, indirect, or incidental beneficiary.

e. Survival of Fourth Interim Order. The provisions of this Fourth Interim Order and any actions taken pursuant hereto shall survive the entry of any order which may be entered (i) confirming any chapter 11 plan of reorganization in the Chapter 11 Cases, (ii) converting any of the Chapter 11 Cases to a case under chapter 7 of the Bankruptcy Code, (iii) to the extent authorized by applicable law, dismissing any of the Chapter 11 Cases, (iv) withdrawing of the reference of any of the Chapter 11 Cases from the Court, or (v) providing for abstention from handling or retaining of jurisdiction of any of the Chapter 11 Cases in the Court.

f. Retention of Jurisdiction. The Court has and will retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement this Fourth Interim Order according to its terms.

g. Debtor Authorization to Effectuate Relief. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Fourth Interim Order.

14. Final Hearing. The final hearing (the "Final Hearing") on the Motion shall be held on May 12, 2026, at 2:00 p.m. (Eastern Time). Any objections or responses to the entry of the proposed Final Order shall be filed with the Court and served on the following no later 4:00 p.m. (Eastern Time) on May 5, 2026: (a) Reliz Technology Group Holdings Inc., 401 West Ontario Street, Suite 400, Chicago, IL 60654 (Attn: Joseph Perry); (b) proposed counsel to the Debtors, McDermott Will & Schulte LLP, The Brandywine Building, 1000 N. West Street, Suite 1400, Wilmington, DE 19801 (Attn: David R. Hurst (dhurst@mcdermottlaw.com) and Andrew A. Mark (amark@mcdermottlaw.com)), One Vanderbilt Avenue, New York, NY 10017 (Attn: Darren Azman (dazman@mcdermottlaw.com), Joseph B. Evans (jbevans@mcdermottlaw.com), and R. Ethan Dover (edover@mcdermottlaw.com)), and 333 SE 2nd Avenue, Suite 4500, Miami, FL 33131 (Attn: Gregg Steinman (gsteinman@mcdermottlaw.com)); (c) counsel to the Prepetition Secured Party, White & Case LLP, Southeast Financial Center, 200 South Biscayne Boulevard, Suite 4900, Miami, Florida 33131-2352 (Attn: Keith H. Wofford (kwofford@whitecase.com), 300 N. LaSalle Drive, Chicago, Illinois 60654 (Attn: Gregory F. Pesce (gpesce@whitecase.com), and 75 State Street, Boston, MA 02109 (Attn: Stephen Moeller-Sally (ssally@whitecase.com); and (d) the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801 (Attn: Benjamin Hackman (benjamin.a.hackman@usdoj.gov)); and (e) proposed counsel to the Official Committee of Unsecured Creditors (the "Committee"), Morris James LLP 3205 Ave N Blvd, Suite 100, Wilmington, DE 19803 (Attn: Eric J. Monzo (emonzo@morrisjames.com) and Tara C. Pakrouh (tpakrouh@morrisjames.com)). If no

objections to entry of the Final Order are filed and served, the Court may enter such Final Order without further notice or hearing.

15. Neither the Fourth Interim Order, nor any such use of cash collateral by the Debtors during this Interim Period, shall be a basis on which to deny, impeach, contradict, or negate the constructive trust claim of Robert J. Bertram, 1548199 Alberta Ltd., and Artha Investment Partners LLC, or any defense of the Debtors, the Committee, Celsius or other parties in interest thereto.

16. Nothing herein shall be deemed a waiver of any parties' rights with respect to any Final Order, and all parties' rights with respect to the same are reserved, including, without limitation, the Committee's right to challenge the validity, perfection, scope, and amount of any prepetition claim or liens of the Prepetition Secured Parties or the waiver of claims against a prepetition creditor in accordance with Del. Bankr. L.R. 4001-2(a)(i)(Q).

EXHIBIT B

Redline Version of Revised Proposed Fourth Interim Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: RELIZ TECHNOLOGY GROUP HOLDINGS INC., *et al.*,[1] Debtors.	Chapter 11 Case No. 26-10371 (TMH) (Jointly Administered) **Related to Docket Nos. 16, 17, 62, 119, 182, 185, 225, 241, 242**

FOURTH INTERIM ORDER (I) AUTHORIZING POSTPETITION USE OF CASH COLLATERAL; (II) GRANTING ADEQUATE PROTECTION TO THE PREPETITION SECURED PARTY; (III) SCHEDULING A FINAL HEARING; AND (IV) GRANTING RELATED RELIEF

Upon the motion (the "Motion")[2] of the Debtors for entry of an interim order (this "Fourth Interim Order") and a Final Order (i) authorizing the use of Cash Collateral, (ii) granting adequate protection to the Prepetition Secured Party, (iii) scheduling a final hearing pursuant to Bankruptcy Rules 4001(b) and (d), and (iv) granting related relief, all as more fully set forth in the Motion; and upon consideration of the First Day Declaration; and the Court having jurisdiction over this matter 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 February 29, 2012; and the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and notice of the Motion having been given in

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

accordance with the Local Rules; and it appearing that no other or further notice is necessary; and it appearing that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and after due deliberation thereon; and good and sufficient cause appearing therefor;

THE COURT HEREBY FINDS AND DETERMINES:[3]

A. Petition Date. On March 15, 2026 (the "Petition Date"), each of the Debtors filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with this Court.

B. Debtors in Possession. The Debtors are continuing to manage and operate their businesses and property as debtors and debtors in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. No request for the appointment of a trustee or examiner has been made in the Chapter 11 Cases. On March 27, 2026, the United States Trustee for the District of Delaware appointed an official committee of unsecured creditors (the "Committee"). *See* Docket No. 104.

C. Jurisdiction and Venue. The Court has jurisdiction to consider the Motion and the relief requested therein in accordance with 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 Court may enter a final order consistent with Article III of the United States Constitution. This is a core proceeding under 28 U.S.C. § 157(b). Venue of this proceeding and the Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

D. Notice. Notice of the Motion and the hearing thereon was provided pursuant to Bankruptcy Rules 2002, 4001(b) and (d), and 9006 and Local Rule 4001-2, as required by sections 361 and 363 of the Bankruptcy Code and the Local Rules. Except as provided herein

[3] To the extent any findings of fact constitute conclusions of law, they are adopted as such, and vice versa.

with respect to notice of the final hearing on the Motion and the Final Order, no further notice of, or hearing on, the relief sought in the Motion is necessary or required. The Debtors have represented that notice of the Motion has been provided by the Debtors to: (a) the U.S. Trustee; (b) the Internal Revenue Service; (c) the Securities and Exchange Commission; (d) the United States Attorney for the District of Delaware; (e) the parties included on the Debtors' list of its 30 largest unsecured creditors; (f) the Prepetition Secured Party; (g) proposed counsel to the Official Committee of Unsecured Creditors (the "Committee"), Morris James LLP 3205 Ave N Blvd, Suite 100, Wilmington, DE 19803 (Attn: Eric J. Monzo (emonzo@morrisjames.com) and Tara C. Pakrouh (tpakrouh@morrisjames.com); and (h) all parties entitled to notice pursuant to Local Rules 2002-1(b) and 9013-1(m) (the "Notice Parties").

E. Necessity of Relief Requested. Good cause has been shown for the entry of this Fourth Interim Order. The Debtors have an immediate need to use Cash Collateral, to, among other things, fund the orderly continuation of their business, maintain the confidence of their customers and vendors, pay their operating expenses, and preserve their going-concern value. In the absence of the availability of such liquidity in accordance with the terms hereof, the continued operation of the Debtors' business and the funding of the administrative costs of the estate would not be possible, and serious and irreparable harm to the Debtors, their estates, and their creditors would occur. The terms for the Debtors' use of Cash Collateral pursuant to this Fourth Interim Order are fair and reasonable, reflect the Debtors' exercise of prudent business judgment consistent with their fiduciary duties, and constitute reasonably equivalent value and fair consideration. The Debtors have requested entry of this Fourth Interim Order pursuant to Bankruptcy Rule 4001(b)(2) and (d). Absent granting the relief sought by this Fourth Interim Order, the Debtors' estates would be immediately and irreparably harmed. The use of Cash

Collateral in accordance with this Fourth Interim Order is therefore in the best interest of the Debtors and their estates, their creditors, and other parties in interest.

F. Adequate Protection of Prepetition Secured Party. In connection with the use of Cash Collateral, the Prepetition Secured Party is entitled to adequate protection of its interests in its Cash Collateral pursuant to sections 361, 363(c)(2) and 363(c) of the Bankruptcy Code to the extent set forth in this Fourth Interim Order. As adequate protection, the Prepetition Secured Party will receive the adequate protection described in paragraphs 4, 5 and 6 of this Fourth Interim Order.

Based upon the foregoing findings and conclusions, the Motion, and the record before this Court with respect to the Motion, and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED AND ADJUDGED that:

1. Motion Granted. The Motion is GRANTED on an interim basis, and the use of Cash Collateral is authorized on an interim basis, in accordance with the terms and conditions set forth in this Fourth Interim Order.

2. Objections to Entry of Fourth Interim Order Overruled. All objections to the entry of this Fourth Interim Order, to the extent not withdrawn, waived, or resolved, are hereby denied and overruled.

3. Authorization to Use Cash Collateral. Subject to the terms and conditions of this Fourth Interim Order, the Debtors are authorized to use the Cash Collateral during the period (the "Interim Period") from the Petition Date through and including the occurrence of the Termination Date (as defined below), *provided that*, the Debtors' use of Cash Collateral shall not exceed $12,500,000.00 during the Interim Period (the "Interim Amount"), *provided further that*, the Debtors may exceed the Interim Amount with the consent of (i) the Prepetition Secured

Party and (ii) the Ad Hoc Group of BlockFills Clients, 1548199 Alberta Ltd., Robert J. Bertram, ~~and~~ the Richard E. Ward Revocable Trust, and Artha Investment Partners LLC; and (iii) the Committee (collectively, the "Consent Parties"), or further order of the Court.

4. Prepetition Secured Party's Adequate Protection. As adequate protection for the Debtors' use of the Cash Collateral, the Prepetition Secured Party is granted and solely to the extent of (a) the postpetition diminution in value of such Prepetition Secured Party's interest in the Cash Collateral resulting from the use, sale, or lease by the Debtors of the Cash Collateral and the imposition or enforcement of the automatic stay pursuant to section 362(a) of the Bankruptcy Code and (b) any valid and enforceable prepetition liens in favor of such Prepetition Secured Party:

a. valid and perfected replacement security interests in and liens (the "Adequate Protection Liens") upon the Debtors' assets and properties (whether existing on the Petition Date or arising or acquired thereafter), including the Prepetition Collateral, and any proceeds thereof (collectively, the "Replacement Collateral"),[4] in each case subject only to any valid, enforceable, and perfected senior liens on the Prepetition Collateral in existence as of the Petition Date (collectively, the "Prior Senior Liens"); *provided*, except as otherwise provided in the Final Order, the Replacement Collateral shall not include any claims or causes of action arising under chapter 5 of the Bankruptcy Code (the "Avoidance Actions"), including any proceeds of such Avoidance Actions,

[4] The Committee expressly reserves all rights related to whether digital assets currently held by the Debtors is property of the Debtors' estates.

b. a superpriority administrative claim (the "Adequate Protection Superpriority Claim") against the Debtors' estates, as and to the extent provided in section 507(b) of the Bankruptcy Code.

5. Reporting. As further adequate protection, the Debtors shall provide the Prepetition Secured Party and the Consent Parties and their respective professionals with the following reports:

a. beginning no later than April 6, 2026, on Monday of each week (or the immediately succeeding business day, if such Monday is not a business day), a report of cash and cryptocurrency on hand as of the close of business on the immediately preceding Friday, which shall indicate (i) the amount and type of each cryptocurrency, (ii) the fair market value of the Debtors' holdings of each such cryptocurrency on such date, and (iii) the amount of cash or other assets received in exchange for any cryptocurrency sold or transferred during the prior week;

b. beginning no later than April 6, 2026, on Monday of each week (or the immediately succeeding business day, if such Monday is not a business day), a report on any sale or other disposition of assets other than cryptocurrency ("Non-Crypto Assets") during the prior week or the entry by any Debtor into an agreement to sell or otherwise dispose of any Non-Crypto Assets;

c. beginning no later than April 6, 2026, on Monday of each week (or the immediately succeeding business day, if such Monday is not a business day), a report on any Intercompany Transactions[5] exceeding $100,000 during the prior week (other than ordinary

[5] "Intercompany Transaction" has the meaning ascribed to such term in the *Interim Order (I) Authorizing Debtors to (A) Continue to Operate their Cash Management System and (B) Maintain Existing Bankr Accounts and Business forms and Honor Certain Prepetition Obligations Related Thereto; (II) Authorizing the Debtors to (A) Continue to Perform Intercompany Transactions and (B) Granting Administrative Expense Status for Postpetition Intercompany Claims; (III) Extending the Time for the Debtors to Comply with Requirements Set Forth in 11 U.S.C. § 345(b); and (IV) Granting Related Relief* [Docket No. 75].

course funding of payroll), including, for each transfer, the name of the transferor, the name of the transferee and the date and amount of the transfer; and

d. beginning no later than April 6, 2026, every other Monday (or the immediately succeeding business day, if such Monday is not a business day), a report on any pending or threatened litigation asserting ownership of or seeking the segregation of, or imposition of a lien or trust on, any cash or cryptocurrency held by the Debtors or any proceeds thereof.

6. Proceeds of Non-Crypto Assets. As further adequate protection, the Debtors shall segregate the proceeds of all Non-Crypto Assets, including, without limitation, proceeds from collections of Non-Crypto Assets (*e.g.*, receivables and other payment intangibles) and proceeds from the sale or other disposition of any Non-Crypto Assets in a separate account, which shall not be disbursed from the separate account absent adjudication by this Court.

~~7. 506(c) and Equities of the Case. As further consideration for the Prepetition Secured Party's consent to the Debtors' continued use of cash collateral, the usage under the first and second interim cash collateral orders, and the increase in the Interim Amount under this Fourth Interim Order, the Debtors shall be deemed to have waived any rights, benefits or causes of action under section 506(c) of the Bankruptcy Code and under the "equities of the case" exception of section 552 of the Bankruptcy Code as they may relate to or be asserted against the Prepetition Secured Party or the liens or collateral securing the Debtors' obligations to the Prepetition Secured Party.~~

7. ~~8.~~ Modification of Automatic Stay. The automatic stay under Bankruptcy Code section 362(a) is hereby modified as necessary to effectuate all of the terms and provisions of this Fourth Interim Order, including, without limitation, to: (a) permit the Debtors to grant the

Adequate Protection Liens and the Adequate Protection Superpriority Claim; (b) permit the Prepetition Secured Party to perform such acts to assure the perfection and priority of the liens granted herein; and (c) permit the Debtors to make any payments authorized to be made in accordance with the terms of this Fourth Interim Order.

8. ~~9.~~ Perfection of Adequate Protection Liens. This Fourth Interim Order shall be sufficient and conclusive evidence of the validity, perfection, and priority of the security interests and liens granted under this Fourth Interim Order, without the necessity of filing or recording any mortgage, financing statement, or other instrument or document which may otherwise be required under the law or regulation of any jurisdiction or the taking of any other action to validate or perfect (in accordance with applicable non-bankruptcy law) the security interests and liens granted herein, or to entitle the Prepetition Secured Party to the priorities granted herein. Notwithstanding the foregoing, the Prepetition Secured Party may file such financing statements, mortgages, deeds of trust, notices of lien, or similar instruments or otherwise confirm perfection of such liens, security interests, and mortgages without seeking modification of the automatic stay under section 362 of the Bankruptcy Code and all such documents shall be deemed to have been filed or recorded at the time of and on the applicable Petition Date. The Prepetition Secured Party may, in its discretion, file a photocopy of this Fourth Interim Order as a financing statement with any recording officer designated to file financing statements or with any registry of deeds or similar office in any jurisdiction in which any Debtor has real or personal property and, in such event, the subject filing or recording officer shall be authorized to file or record such copy of this Fourth Interim Order. For the avoidance of doubt, nothing in this Fourth Interim Order shall constitute a finding of fact or conclusion of law regarding the existence, validity, amount, or perfection of any debt(s) owed to or lien(s) or other interest(s) granted in favor of the

Prepetition Secured Party, and the rights of all parties-in-interest, including without limitation the Committee and any chapter 7 or 11 trustee appointed or elected in these cases, to challenge the existence, validity, amount, and perfection of any debt(s) owed to or lien(s) or other interest(s) granted in favor of the Prepetition Secured Party are fully reserved. In the event of a successful challenge, the court can fashion an appropriate remedy.

9. ~~10.~~ Professional Fee Escrow. The fees and expenses of the Debtors' professionals (the "Debtor Professionals") and the Committee's professionals (the "Committee Professionals" and, together with the Debtor Professionals, the "Professionals") shall be set aside weekly based on the actual accruals of the Professionals' incurred fees and expenses from the prior week and held by the Debtor in a segregated account for the sole benefit of the Professionals (the "Professional Fee Escrow"). For the avoidance of doubt, during the Interim Period, the amount in the Professional Fee Escrow, together with all of the Debtors' other uses of Cash Collateral during the Interim Period, shall not exceed the Interim Amount. The amount paid by the Debtor in any month for the fees and expenses of the Professionals shall only be paid after consultation with the Committee and upon allowance or authorization by this Court from funds on deposit in the Professional Fee Escrow. In addition, until such time as this Court considers the fees and expenses of the Professionals on a final basis, the Debtor Professionals and Committee Professionals shall only be entitled to satisfy their fees from the amounts allocated to each. When this Court considers the fees and expenses of the Professionals on a final basis, to the extent there are funds allocated to either the Debtor Professionals or the Committee Professionals in excess of what is needed to satisfy the remaining fees and expenses owed to either group of Professionals, those excess funds may be used to satisfy the fees and expenses of any

Professional. For the avoidance of doubt, payment of the Professionals' fees and expenses are not limited solely to funds held in the Professional Fee Escrow.

10. ~~11.~~ Termination Date. The Debtors' right to use Cash Collateral shall terminate on the earliest to occur of the following (a "Termination Date"): (x) 11:59 p.m., New York City time, on April 29, 2026, (y) 11:59 p.m., New York City time, on the date of the final hearing, unless a Final Order is entered extending the Debtors' right to use Cash Collateral; and (z) the date upon which the Court issues an order following notice and a hearing providing for the termination of the further use of Cash Collateral due to the failure by the Debtors to comply with the materials terms, covenants, and conditions of this Fourth Interim Order.

11. ~~12.~~ Rights of the Prepetition Secured Party. Nothing in this Fourth Interim Order shall be deemed or construed to limit the Prepetition Secured Party's rights to seek other or further adequate protection. Without limiting the foregoing, upon the occurrence of a Trigger Event (as defined below), the Prepetition Secured Party shall be entitled to an emergency hearing on a motion for additional adequate protection within three business days after the filing of such a motion, subject to the Court's availability. For purposes of this Fourth Interim Order, the term "Trigger Event" means when the fair market value of cash and cryptocurrency in the Debtors' possession *minus* the Interim Amount and the Contested Amount (as defined below) is equal to or less than $10,000,000.00. "Contested Amount" means the value of any of the Debtors' cash or cryptocurrency that is subject to an order of any court of competent jurisdiction that either (A) finds that cryptocurrency held by the Debtors or the proceeds thereof is not property of the estate, (B) grants the segregation of, or imposition of a lien or trust on, cash or cryptocurrency held by the Debtors or any proceeds thereof, or (C) restrains or enjoins the Debtors' use of cash or cryptocurrency in their possession for any reason.

12. ~~13.~~ Reservation of Rights. Notwithstanding anything herein or in the Motion to the contrary herein, the Debtors reserve all of their rights and nothing herein or in the Motion shall prejudice the Debtors' ability, to (a) seek any further use of Cash Collateral (including on a non-consensual basis) on any terms and conditions, (b) to the extent that any cash payment made to the Prepetition Secured Party as adequate protection is not allowed under section 506(b) of the Bankruptcy Code, seek to recharacterize and apply such payment toward principal owed under the Promissory Notes, (c) seek marshalling with respect to the Promissory Notes, (d) seek relief under section 552(b) of the Bankruptcy Code, or (e) dispute any claim or lien on any grounds. The rights of all parties in interest (including the Prepetition Secured Party) with respect to any request to use Cash Collateral, the validity, extent, and priority of any claims, and any purported liens securing such claims are reserved in all respects.

13. ~~14.~~ Miscellaneous.

a. Binding Effect of Fourth Interim Order. The provisions of this Fourth Interim Order, including all findings herein, shall be binding upon all parties in interest in the Chapter 11 Cases, including, without limitation, the Prepetition Secured Party, the Debtors, and their respective successors and assigns (including any trustee hereinafter appointed or elected for the estate of any Debtor, an examiner appointed pursuant to section 1104 of the Bankruptcy Code, or any other fiduciary appointed as a legal representative of the Debtors or with respect to the property of the estate of any of the Debtors).

b. Headings. The headings in this Fourth Interim Order are for purposes of reference only and shall not limit or otherwise affect the meaning of this Fourth Interim Order.

c. Effect of this Fourth Interim Order. This Fourth Interim Order shall constitute findings of fact and conclusions of law pursuant to Bankruptcy Rule 7052.

d. No Third Party Rights. Except as explicitly provided for herein, this Fourth Interim Order does not create any rights for the benefit of any third party, creditor, equity holder or any direct, indirect, or incidental beneficiary.

e. Survival of Fourth Interim Order. The provisions of this Fourth Interim Order and any actions taken pursuant hereto shall survive the entry of any order which may be entered (i) confirming any chapter 11 plan of reorganization in the Chapter 11 Cases, (ii) converting any of the Chapter 11 Cases to a case under chapter 7 of the Bankruptcy Code, (iii) to the extent authorized by applicable law, dismissing any of the Chapter 11 Cases, (iv) withdrawing of the reference of any of the Chapter 11 Cases from the Court, or (v) providing for abstention from handling or retaining of jurisdiction of any of the Chapter 11 Cases in the Court.

f. Retention of Jurisdiction. The Court has and will retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement this Fourth Interim Order according to its terms.

g. Debtor Authorization to Effectuate Relief. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Fourth Interim Order.

14. ~~15.~~ Final Hearing. The final hearing (the "Final Hearing") on the Motion shall be held on May 12, 2026, at 2:00 p.m. (Eastern Time). Any objections or responses to the entry of the proposed Final Order shall be filed with the Court and served on the following no later 4:00 p.m. (Eastern Time) on ~~April 27~~May 5, 2026: (a) Reliz Technology Group Holdings Inc., 401 West Ontario Street, Suite 400, Chicago, IL 60654 (Attn: Joseph Perry); (b) proposed counsel to the Debtors, McDermott Will & Schulte LLP, The Brandywine Building, 1000 N. West Street, Suite 1400, Wilmington, DE 19801 (Attn: David R. Hurst (dhurst@mcdermottlaw.com) and Andrew A. Mark (amark@mcdermottlaw.com)), One Vanderbilt Avenue, New York, NY 10017

(Attn: Darren Azman (dazman@mcdermottlaw.com), Joseph B. Evans (jbevans@mcdermottlaw.com), and R. Ethan Dover (edover@mcdermottlaw.com)), and 333 SE 2nd Avenue, Suite 4500, Miami, FL 33131 (Attn: Gregg Steinman (gsteinman@mcdermottlaw.com)); (c) counsel to the Prepetition Secured Party, White & Case LLP, Southeast Financial Center, 200 South Biscayne Boulevard, Suite 4900, Miami, Florida 33131-2352 (Attn: Keith H. Wofford (kwofford@whitecase.com), 300 N. LaSalle Drive, Chicago, Illinois 60654 (Attn: Gregory F. Pesce (gpesce@whitecase.com), and 75 State Street, Boston, MA 02109 (Attn: Stephen Moeller-Sally (ssally@whitecase.com); and (d) the United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801 (Attn: Benjamin Hackman (benjamin.a.hackman@usdoj.gov)); and (e) proposed counsel to the Official Committee of Unsecured Creditors (the "Committee"), Morris James LLP 3205 Ave N Blvd, Suite 100, Wilmington, DE 19803 (Attn: Eric J. Monzo (emonzo@morrisjames.com) and Tara C. Pakrouh (tpakrouh@morrisjames.com)). If no objections to entry of the Final Order are filed and served, the Court may enter such Final Order without further notice or hearing.

15. ~~16.~~ Neither the Fourth Interim Order, nor any such use of cash collateral by the Debtors during this Interim Period, shall be a basis on which to deny, impeach, contradict, or negate the constructive trust claim of Robert J. Bertram ~~and~~, 1548199 Alberta Ltd., and Artha Investment Partners LLC, or any defense of the Debtors, the Committee, Celsius or other parties in interest thereto.

16. ~~17.~~ Nothing herein shall be deemed a waiver of any parties' rights with respect to any Final Order, and all parties' rights with respect to the same are reserved, including, without limitation, the Committee's right to challenge the validity, perfection, scope, and amount of any

prepetition claim or liens of the Prepetition Secured Parties or the waiver of claims against a prepetition creditor in accordance with Del. Bankr. L.R. 4001-2(a)(i)(Q).