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) **Obj. Deadline: November 9, 2026 at 4:00 p.m. (ET)** **Hearing Date: December 1, 2026 at 10:00 a.m. (ET)**

GUC TRUSTEE'S MOTION FOR ENTRY OF AN ORDER EXTENDING THE ADMINISTRATIVE CLAIMS OBJECTION DEADLINE TO JANUARY 25, 2027

David Dunn, as the GUC Trustee of the Reliz Liquidating Trust (the "GUC Trustee") hereby moves (this "Motion") for entry of an order, substantially in the form attached hereto as **Exhibit A**, extending the deadline to object to administrative claims by ninety-one (91) days[2], from October 26, 2026 (the "Administrative Claims Objection Deadline"), through and including January 25, 2027. In support of the Motion, the GUC Trustee respectfully states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334.

2. Venue of this proceeding and the Motion is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory and legal predicates for the relief requested herein is sections 105(a), 502, and 503 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "Bankruptcy Code"), Rule 9006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and

[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] 90 days from the Administrative Claims Objection Deadline is Sunday, January 24, 2027.

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Local Rules 9006-1 and 9006-2.

BACKGROUND

4. On March 15, 2026 (the "Petition Date"), each Debtor commenced a case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code (collectively, the "Chapter 11 Cases") in the Court.

5. Additional factual background and information regarding the Debtors, including their business operations, their corporate and capital structure, their restructuring activities, and the events leading to the commencement of the Chapter 11 Cases, is set forth in detail in the *Declaration of Mark Renzi in Support of Chapter 11 Petitions and First Day Motions* (the "First Day Declaration") [Docket No. 3], which is incorporated herein by reference.

6. On April 14, 2026, the Court entered the *Order (A) Establishing Bar Dates to File Proofs of Claim; (II) Approving Procedures for Filing Proofs of Claim; (III) Approving Form and Manner of Notice of Bar Dates; (IV) Granting Related Relief* (the "Bar Date Order") [Docket No. 176].

7. The Bar Date Order established May 14, 2026, at 4:00 p.m. (prevailing Eastern Time) as the deadline for creditors to file proofs of claim for each claim they assert against the Debtors that arose before the Petition Date (the "General Bar Date"). The Bar Date Order also established the governmental bar date for governmental units to file proofs of claims against any Debtor as September 11, 2026, at 4:00 p.m. (Prevailing Eastern Time). Additionally, the Bar Date Order approved the form proof of claim to be filed against the Debtors and the manner of giving notice of the General Bar Date (the "Bar Date Notice"). The Bar Date Notice was published in The New York Times on April 20, 2026 and CoinDesk on April 27, 2026 [Docket No. 296].

8. On July 13, 2026, the Court entered the *Findings of Fact, Conclusions of Law, and*

Order Confirming the Second Amended Joint Chapter 11 Plan of Reliz Technology Group Holdings Inc. and its Debtor Affiliates [Docket No. 527], which confirmed the *Second Amended Joint Chapter 11 Plan of Reliz Technology Group Holdings Inc. and its Debtor Affiliates* [Docket No. 510-1] (amended, supplemented, or otherwise modified, the "Plan").

9. On July 28, 2026, the Plan went into effect in accordance with its terms. *See Notice of (I) Entry of Order Confirming the Second Amended Joint Chapter 11 Plan of Reliz Technology Group Holdings Inc. and its Debtor Affiliates; (II) Occurrence of Effective Date of the Plan; (III) Substantial Consummation of the Plan; and (IV) Certain Bar Dates* [Docket No. 542] (the "Notice of Effective Date"). The Notice of Effective Date established an administrative claims bar date as August 27, 2026 (the "Administrative Claims Bar Date").

10. Pursuant to the Confirmation Order and Plan, on the Effective Date, the GUC Trustee was appointed in these Chapter 11 Cases. *See* Confirmation Order, ¶ 13; Plan, Article IV.N.4. As GUC Trustee, David Dunn has the right, authority, and responsibility to object to, seek to subordinate, compromise or settle any and all Claims, including by filing and prosecuting objections to Claims, subject to the limitations set forth in the Plan. *See* Plan, Article IV.N.5. Additionally, the GUC Trustee has the right to assert any and all rights and defenses that the applicable Debtor had with respect to any Claim immediately before the Effective Date. *Id*.

11. The Plan established October 26, 2026 as the deadline to (i) object to Administrative Claims (defined in the Plan as the "Administrative Claims Objection Deadline"), and (ii) object to Claims other than Administrative Claims and Professional Fee Claims (defined in the Plan as the "Claims Objection Deadline"). *See* Plan, Article I(A)(26).

12. Although the GUC Trustee has been working diligently to effectuate the claims reconciliation process, additional work remains.

CLAIMS RECONCILIATION PROCESS

13. The register of claims (the "Claims Register") prepared and maintained by Verita Global, f/k/a Kurtzman Carson Consultants LLC ("KCC"), reflects that, as of the date of this Motion, three (3) requests for payment of Administrative Claims (the "Administrative Claim Requests") have been filed with the Court.

14. The GUC Trustee respectfully requests entry of an order extending the Administrative Claims Objection Deadline for a period of ninety-one (91) days through and including January 25, 2027.[3] The proposed extension is without prejudice to the rights of the GUC Trustee to seek additional extensions of the Administrative Claims Objection Deadline, as appropriate.

BASIS FOR RELIEF

15. Sections 502 and 503 of the Bankruptcy Code contemplate that, claims will be challenged when appropriate and, if necessary, estimated. *See* 11 U.S.C. §§ 502(b)–(c), 503. The Plan vests the discretion to object to or seek estimation of Claims and Administrative Claim Requests of the Post-Effective Date Debtors' estate.

16. Bankruptcy Rule 9006(b) also provides for extensions of time for cause. Specifically:

> [W]hen an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion … with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order.

Fed R. Bankr. P. 9006(b)(1).

[3] Pursuant to Local Rule 9006-2, the filing of this Motion prior to the expiration of the current Administrative Claims Objection Deadline serves to automatically extend the Administrative Claims Objection Deadline until such time as the Court rules on this Motion. *See* Del. Bankr. LR 9006-2.

17. Finally, section 105 of the Bankruptcy Code provides that the "court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a).

18. The GUC Trustee submits that extension of the Administrative Claims Objection Deadline is fundamental to the efficient administration of the Plan and estate and is in the best interests of creditors. As discussed above, the GUC Trustee has been working diligently since the Effective Date.

19. Since the Effective Date, the GUC Trustee has worked to address the Administrative Claim Requests, in addition to the myriad of other day-to-day tasks undertaken by the GUC Trustee. To ensure the fair and proper administration of the Debtors' estate, the GUC Trustee requires additional time to reconcile the remaining Administrative Claim Requests and, only if appropriate, to file objections. The requested extension of the Administrative Claims Objection Deadline will not prejudice any claimant or other party in interest and will benefit creditors holding valid claims of all priority levels.

20. As the reconciliation process remains ongoing, the GUC Trustee requests this extension of time to preserve his right to object to any additional claims that come to their attention or that they are unable to resolve. Extension of the Administrative Claims Objection Deadline is not sought for purposes of delay, nor will it affect any claimant's substantive defense(s) to any objection. Rather, the extension is intended to ensure that Administrative Claim Requests will only be challenged after a meaningful review.

21. Absent the extension, the Debtors' estate may suffer unnecessary and unfair prejudice. The GUC Trustee will be precluded from challenging invalid, misclassified and/or overstated Administrative Claim Requests, as applicable.

22. The requested extension will not only allow the GUC Trustee to properly review any remaining unresolved Administrative Claim Requests but will also conserve the limited resources of the Debtors' estate and the Administrative Claims Reserve to the benefit of all the Debtors' stakeholders by allowing the GUC Trustee time to pursue settlement, and avoid the delay and expense of unnecessary objections and litigation.

RESERVATION OF RIGHTS

23. While the GUC Trustee will endeavor to resolve all of the remaining unresolved Administrative Claim Requests within the time of the requested extension, the GUC Trustee reserves all of its rights to seek further extensions of the Administrative Claims Objection Deadline, as appropriate, as well as to object to and/or seek estimation of particular Administrative Claim Requests.

NOTICE

24. Notice of this Motion will be provided to (i) the Office of the United States Trustee for the District of Delaware and (ii) all parties who, as of the filing of the Motion, have filed a notice of appearance and request for service of papers pursuant to Bankruptcy Rule 2002. In light of the procedural nature of the post-confirmation relief requested herein, the GUC Trustee submits that such notice is sufficient under the circumstances and that no other or further notice is required.

WHEREFORE, the GUC Trustee respectfully request that this Court enter an order, substantially in the form attached hereto as **Exhibit A**: (i) extending the Administrative Claims Objection Deadline through and including January 25, 2027, without prejudice to the rights of the GUC Trustee to seek additional extensions of such deadline as appropriate; and (ii) granting such other and further relief as the Court may deem just and proper.

Dated: October 26, 2026
Wilmington, Delaware

MORRIS JAMES LLP

/s/ Samantha L. Rodriguez

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EXHIBIT A

Proposed Order

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.	**Re: Docket No. ___**

ORDER EXTENDING THE ADMINISTRATIVE CLAIMS OBJECTION DEADLINE TO JANUARY 25, 2027

Upon the joint motion (the "Motion")[2] of David Dunn, as the GUC Trustee of the Reliz Liquidating Trust (the "GUC Trustee"), for the entry of an order (this "Order") extending the deadline to object to Administrative Claim Requests through and including January 25, 2027; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; venue being proper before this Court; consideration of the Motion and the relief requested being a core proceeding pursuant to 28 U.S.C. § 157(b); due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors' estate, its creditors and all parties in interest, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

[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 such terms in the Motion.

2. The Administrative Claims Objection Deadline shall be, and hereby is, extended through and including January 25, 2027, as to all Administrative Claim Requests.

3. This Order is without prejudice to the rights of the GUC Trustee to seek further extensions of the Administrative Claims Objection Deadline.

4. The Court shall retain jurisdiction to construe and enforce this Order.

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.	**Obj. Deadline: November 9, 2026 at 4:00 p.m. (ET)** **Hearing Date: December 1, 2026 at 10:00 a.m. (ET)**

NOTICE OF GUC TRUSTEE'S MOTION FOR ENTRY OF AN ORDER EXTENDING THE ADMINISTRATIVE CLAIMS OBJECTION DEADLINE TO JANUARY 25, 2027

PLEASE TAKE NOTICE that on October 26, 2026, David Dunn, as the GUC Trustee of the Reliz Liquidating Trust (the "GUC Trustee"), filed the *GUC Trustee's Motion for Entry of an Order Extending the Administrative Claims Objection Deadline to January 25, 2027* ("Motion") with the United States Bankruptcy Court for the District of Delaware ("Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Motion must be in writing, in conformity with the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and filed with the Bankruptcy Court, so as to be received on or before **November 9, 2026 at 4:00 p.m. (ET) ("Objection Deadline")**. At the same time, you must also serve a copy of the response upon the GUC Trustee's undersigned counsel.

PLEASE TAKE FURTHER NOTICE THAT a hearing on the Motion will be held on **December 1, 2026 at 10:00 a.m. (ET) (the "Hearing Date")** before the Honorable Thomas M. Horan, United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Courtroom #7, Wilmington, Delaware 19801.

IF NO OBJECTIONS ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH SUCH PLEADINGS WITHOUT FURTHER NOTICE OR HEARING.

Dated: October 26, 2026
Wilmington, Delaware

MORRIS JAMES LLP

/s/ Samantha L. Rodriguez
Eric J. Monzo (DE Bar No. 5214)
Tara Pakrouh Evans (DE Bar No. 6192)
Samantha L. Rodriguez (DE Bar No. 7524)
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: RELIZ TECHNOLOGY GROUP HOLDINGS INC., *et al.*, Debtors.[1]	Chapter 11 Case No. 26-10371 (TMH) (Jointly Administered)

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of October, 2026, I caused to be filed with the Court electronically, and I caused to be served a true and correct copy of the *GUC Trustee's Motion for Entry of an Order Extending the Administrative Claims Objection Deadline to January 25, 2027* upon the parties that are registered to receive notice via the Court's CM/ECF notification system, and additional service via electronic mail on the parties listed on the attached service list.

/s/ Samantha L. Rodriguez
Samantha L. Rodriguez (DE Bar No. 7524)

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Core/2002 Service List

Description	CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip	Email
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Counsel to the Post Effective Date Debtors	McDermott Will & Schulte LLP	Gregg Steinman	333 SE 2nd Avenue, Suite 4500		Miami	FL	33131	gsteinman@mcdermottlaw.com
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Post Effective Date Debtors	Reliz Technology Group Holdings Inc.	Joe Perry, Interim Chief Executive Officer	33 Irving Place		Chicago	IL	10003	joe.perry@blockfills.com