IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
SAGA FORMATIONS, INC., *et al*.,[1]	)	Case No. 24-11161 (BLS)
Debtors.	)	(Jointly Administered)
	)	**Ref. Docket No.: 1204**

CERTIFICATION OF COUNSEL REGARDING ORDER DIRECTING THE PRODUCTION OF DOCUMENTS AND EXAMINATION OF THE DEBTORS' BANKS AND MCA LENDERS PURSUANT TO BANKRUPTCY RULE 2004 AND LOCAL BANKRUPTCY RULE 2004-1

On July 23, 2026, Timothy Pohl, in his sole capacity as the plan administrator (the "Plan Administrator") for the above-captioned post-effective date debtors (the "Debtors") filed the *Motion for an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004-1 Directing the Production of Documents and the Examination of the Debtors' Banks and MCA Lenders* [Docket No. 1204] (the "Motion")[2] with the United States Bankruptcy Court for the District of Delaware (the "Court"). A proposed order (the "Proposed Order") was attached to the Motion as Exhibit A. The deadline to file objections or otherwise respond to the Motion was August 6, 2026 at 4:00 p.m. (ET) (the "Objection Deadline").

Prior to the Objection Deadline, the Plan Administrator received an informal response from one of the MCA Lenders, Shift Capital ("Shift"). The Plan Administrator has agreed to extend Shift's deadline to object or otherwise respond to the Motion through August 18, 2026,

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Saga Formations, Inc. f/k/a Epic Creations, Inc. (9113), Pajeau, Inc. f/k/a Neuron Fuel, Inc. (8758), and Tangible Play, Inc. (9331).

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

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thereby affording the parties an opportunity to resolve Shift's response consensually. No other formal or informal responses or objections to the Motion were received.

The Plan Administrator has revised the Proposed Order (the "Revised Proposed Order") to: (a) reflect that Shift is not subject to the Revised Proposed Order; and (b) attach, as Exhibit 1 to the Revised Proposed Order, the list of Transaction Participants that was previously included as an exhibit to the Motion. A copy of the Revised Proposed Order is attached hereto as **Exhibit A**. For the convenience of the Court and all parties in interest, a blackline comparing the Revised Proposed Order to the original Proposed Order is attached hereto as **Exhibit B**.

WHEREFORE, as the Plan Administrator did not receive any objections or responses other than that described herein, the Plan Administrator respectfully requests that the Court enter the Revised Proposed Order, without further notice or hearing at the Court's earliest convenience.

[*Remainder of page intentionally left blank*]

Dated: August 13, 2026
Wilmington, Delaware

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Exhibit A

Revised Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
SAGA FORMATIONS, INC., *et al*.,[1]	)	Case No. 24-11161 (BLS)
Debtors.	)	(Jointly Administered)
	)	**Ref. Docket No.: 1204**

ORDER DIRECTING THE PRODUCTION OF DOCUMENTS AND EXAMINATION OF THE DEBTORS' BANKS AND MCA LENDERS PURSUANT TO BANKRUPTCY RULE 2004 AND LOCAL BANKRUPTCY RULE 2004-1

Upon consideration of the motion (the "Motion")[2] of the Plan Administrator for the above-captioned post-effective date debtors (the "Debtors"), for entry of this order (this "Order"), pursuant to Bankruptcy Rule 2004 and Local Rule 2004-1, directing the requested production of documents and examinations; and this 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 this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors, their creditors, and other parties in interest; and this Court having found that the Plan Administrator's notice of the Motion and opportunity for a

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hearing on the Motion were appropriate and no other notice need be provided; and this Court having reviewed the Motion; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

2. The Plan Administrator is authorized to issue subpoenas substantially in the form attached as Exhibit D to the Motion to the MCA Lenders and subpoenas substantially in the form attached as Exhibit E to the Motion to the Banks pursuant to Rule 2004 and Local Rule 2004-1. A list of the applicable MCA Lenders and Banks (collectively, the "Transaction Participants")[3] is attached hereto as **Exhibit 1**.

3. The Transaction Participants are directed to (i) produce documents in response to the document requests in the subpoenas within fourteen (14) days of the service of the subpoenas and/or (ii) appear for oral examination and provide testimonies on topics set forth in the subpoenas, upon reasonable notice and, absent other agreement with the Plan Administrator, in no event more than twenty-one (21) days from the date of the service of the subpoenas.

4. The Transaction Participants must comply with the aforementioned deadlines and participate in good faith in the requested discovery.

5. The Plan Administrator may serve, in due course, pursuant to Bankruptcy Rule 2004, such additional discovery requests, including follow-up requests and oral examinations, as to the same subject matters, upon the Transaction Participants.

[3] For the avoidance of doubt, Shift Capital is not an MCA Lender or a Transaction Participant under this Order.

6. Notwithstanding anything herein to the contrary, the Motion is adjourned as to Shift Capital to a date to be determined. Nothing herein shall prejudice, waive, or otherwise affect the rights of the Plan Administrator or Shift Capital concerning the relief requested in the Motion, all of which rights are expressly reserved.

7. This Order is without prejudice to the right of the Plan Administrator to seek further discovery of any other entity.

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

9. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Exhibit 1

Transaction Participants

Name	Registered Address	Role
24 Capital LLC	80 STATE STREET, ALBANY, NY, UNITED STATES, 12207 - 2543	MCA Lender
Riverside Capital NY LLC	6 Landmark Sq, 4th Floor, Stamford, CT, 06901-2701	MCA Lender
City Capital NY LLC	164 20TH STREET 4E, BROOKLYN, NY, 11232	MCA Lender
Fidi Capital Inc.	150 BROADWAY, RM 701, NEW YORK, NY, 10038	MCA Lender
Progressive Capital (c/o MCA Management Group)	99 Wall Street Suite #3626 New York NY 10005	MCA Lender
Symplifi Capital (a/k/a Funders App LLC)	CORPORATION SERVICE COMPANY 1201 HAYS STREET TALLAHASSEE, FL 32301	MCA Lender
Redstone Advance Inc.	605 Lincoln Road, 5th Floor, MIAMI BEACH, FL 33139	MCA Lender
American Funding Services, Inc.	FLORIDA FILING & SEARCH SERVICES, INC., 155 OFFICE PLAZA DR. TALLAHASSEE, FL 32301; 8950 Southwest 74th Court Suite 2201 MIAMI, FL 33156	MCA Lender
Lion Business Funding LLC	1266 E MAIN ST SUITE 700R, STAMFORD, CT, 06901; 500 West Putnam Ave, Suite 400 Greenwich, CT 06830	MCA Lender
Cobalt Funding Solutions LLC	99 WALL STREET, 3618, NEW YORK, NY, UNITED STATES, 10005	MCA Lender
Coldwater Capital Inc	109 South Spring Street, Floor 1, Brooklyn, NY 11249; 1111 Lincoln Road, Miami Beach, FL 33139	MCA Lender
Infusion Capital Group LLC (D/B/A Paragon Capital)	572 SACKETT ST, BROOKLYN, NY, UNITED STATES, 11217	MCA Lender
Alva Advance LLC	80 State Street, Albany, NY 12207-2543	MCA Lender
Cheetah Capital, Inc	605 Lincoln Road, 5th Floor, MIAMI BEACH, FL 33139	MCA Lender
Secure Capital LLC	243 Tresser Blvd, 17th Flr, Stamford, CT, 06901	MCA Lender
Smart Business Funding (a/k/a Collins Cash Inc.)	601 OCEAN PARKWAY APT 8E, BROOKLYN, NY, UNITED STATES, 11218	MCA Lender
Itria Ventures LLC	251 LITTLE FALLS DRIVE, WILMINGTON DE 19808; Itria Ventures LLC, One Penn Plaza, Suite 4530, New York, NY 10119;	MCA Lender
Canon Advance LLC	500 W Putnam Ave Ste 400, Greenwich, CT, 06830-6096, United States	MCA Lender
BMF Advance LLC	1820 AVE M STE 125, BROOKLYN, NY, UNITED STATES, 11230	MCA Lender
Mr. Advance LLC	20200 W. Dixie Hwy Miami, FL 33180	MCA Lender
Amerifi Capital LLC	39 REMSEN ROAD, KINGS POINT, NY, UNITED STATES, 11024; 19495 BISCAYNE BLVD. SUITE 408 AVENTURA, FL 33180; 1200 SOUTH PINE ISLAND ROAD PLANTATION, FL 33324	MCA Lender
ACH Capital West, LLC	375 W 200 S SUITE 225, Salt Lake City, UT, 84101, USA	MCA Lender

Name	Registered Address	Role
Nexi Finance (f/k/a Fundamental Capital LLC)	20803 Biscayne Blvd. Suite 401 Aventura, FL 33180 100 Garden City Plaza, Suite 410 Garden City, NY 11530	MCA Lender
Geko Capital Fund	GEKO CAPITAL FUND 244 FIFTH AVENUE, SUITE 2585, NEW YORK, NY 10001	MCA Lender
22 Capital Inc	53 Bridge St. Suite 501 Brooklyn NY, 11201	MCA Lender
Chase Bank	Mail Code LA2-7300 1414 Woodward Avenue Ruston, LA 71270-2015	Bank
Silicon Valley Bank	2625 Augustine Drive, Suite 301 Santa Clara, CA 95054	Bank
Citibank	5800 S. Corporate Place, MC-451 Sioux Falls, SD 57108	Bank

Exhibit B

Blackline

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and opportunity for a hearing on the Motion were appropriate and no other notice need be provided; and this Court having reviewed the Motion; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor,

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7. ~~5.~~ This Order is without prejudice to the right of the Plan Administrator to seek further discovery of any other entity.

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

9. ~~7.~~ This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation of this Order.