IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: SAGA FORMATIONS, INC.,[1] Debtor.	Chapter 11 Case No. 24-11161 (BLS) **Hearing Date: TBD** **Objection Deadline: November 19, 2026**
NICHOLAS RUBIN, PLAN ADMINISTRATOR, Plaintiff, v. BMF ADVANCE LLC, REDSTONE ADVANCE, INC., CHEETAH CAPITAL INC., HOP CAPITAL, FUNDERZ.NET LLC, JOSEPH YITZCHAKOV (a/k/a JOSEPH ISAACOV, a/k/a JOSEPH ISAACOFF), GAVRIEL YITZCHAKOV (a/k/a GABRIEL ISAACOV), AND JOHN DOES 1-10, Defendants.	Adv. Pro. No. 26-50979 (BLS)
NICHOLAS RUBIN, PLAN ADMINISTRATOR, Plaintiff, v. ITRIA VENTURES LLC, BIZ2CREDIT INC., AND JOHN DOES 1-10, Defendants.	Adv. Pro. No. 26-50975 (BLS)

[1] The last four digits of Saga Formations, Inc. f/k/a Epic Creations, Inc. federal tax identification number are 9113. In addition to the foregoing Debtor, the "Debtors" include certain affiliated entities, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Debtors' claims and noticing agent at https://www.veritaglobal.net/epiccreations. All motions, contested matters, and adversary proceedings that remained open as of the closing of such cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Saga Formations, Inc., Case No. 24-11161 (BLS).

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NICHOLAS RUBIN, PLAN ADMINISTRATOR, Plaintiff, v. SMART BUSINESS FUNDING, COLLINS CASH INC., ABRAHAM COHEN (a/k/a ABRAHAM COLLIN, a/k/a ANTHONY COLLIN) AND JOHN DOES 1-10, Defendants.	Adv. Pro. No. 26-50995 (BLS)
NICHOLAS RUBIN, PLAN ADMINISTRATOR, Plaintiff, v. AMERIFI CAPITAL LLC, WYNWOOD CAPITAL GROUP, LLC (D/B/A AMERIFI CAPITAL; D/B/A GEKO CAPITAL FUND), YOEL TEITELBAUM (A/K/A JOEL TEITELBAUM, A/K/A JOE TEITELBAUM), DAVID SULAYMANOV (A/K/A DAVID SALOMON), AND JOHN DOES 1-10, Defendants.	Adv. Pro. No. 26-51108 (BLS)
NICHOLAS RUBIN, PLAN ADMINISTRATOR, Plaintiff, v. FUNDERS APP LLC (D/B/A 24 CAPITAL, D/B/A SYMPLIFI CAPITAL, D/B/A MR. ADVANCE), 24 CAPITAL LLC, MR. ADVANCE LLC, SECURE CAPITAL FUNDING LLC, DC FUND LLC (D/B/A SECURE CAPITAL), MARK ALLAYEV, JONATHAN ALLAYEV, AND JOHN DOES 1-10, Defendants.	Adv. Pro. No. 26-51118 (BLS)

PLAN ADMINISTRATOR'S MOTION FOR AN ORDER (I) AUTHORIZING THE FILING UNDER SEAL OF COMPLAINTS CONTAINING CERTAIN CONFIDENTIAL INFORMATION AND (II) GRANTING RELATED RELIEF

Nicholas Rubin, in his sole capacity as the plan administrator (the "Plan Administrator") for the above-captioned post-effective date debtor and certain debtor affiliates (the "Debtors"), by and through his undersigned counsel, submits this motion (the "Motion") for entry of an order (the "Proposed Order"), substantially in the form attached hereto as **Exhibit A**, authorizing the filing under seal of complaints containing certain confidential information and granting related relief. In support of this Motion, the Plan Administrator respectfully states as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the "Court") has 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 as of February 29, 2012. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and the Plan Administrator confirms his consent, pursuant to rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory and legal predicates for the relief requested herein are sections 105(a), 107(b), and 107(c) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532

(the "Bankruptcy Code"), rule 9018 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Local Rule 9018-1(d).

BACKGROUND[2]

4. The Plan Administrator for the Debtors' bankruptcy estate was appointed pursuant to the *Findings of Fact, Conclusions of Law, and Order Confirming the Amended Combined Disclosure Statement and Chapter 11 Plan for the Estates of Saga Formations, Inc., Pajeau, Inc., and Tangible Play, Inc*. [D.I. 1009] (the "Confirmation Order") dated October 29, 2025, confirming the *Second Amended Combined Disclosure Statement and Chapter 11 Plan for the Estates of Saga Formations, Inc., Pajeau, Inc., and Tangible Play, Inc*. [D.I. 971] (the "Plan"), the *Plan Administrator Agreement* [D.I. 1147-1] (the "Plan Administrator Agreement"), and the *Notice of Appointment of Successor Plan Administrator* [D.I. 1235]. On March 31, 2026, the Plan went effective [D.I. 1148].

5. Under the Plan and Confirmation Order, part of the Plan Administrator's mandate is to pursue the Retained Causes of Action (as defined in the Plan).

6. On October 26, 2026, the Plan Administrator filed the *Complaint for (I) Avoidance and Recovery of Transfers Pursuant to N.Y. Debtor & Creditor Law §§ 273, 274, 276 & 277 and (II) Related Relief* [Case No. 26-50975, Docket No. 2] ("Complaint 1"), and the *Complaint for (I) Avoidance and Recovery of Transfers Pursuant to N.Y. Debtor & Creditor Law §§ 273, 274, 276 & 277 (II) Civil RICO Pursuant to 18 U.S.C. § 1962 and (III) Related Relief* [Case No. 26-50979, Docket No. 2] ("Complaint 2").

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[2] Additional information regarding the Debtors' chapter 11 cases is set forth in the Plan.

7. On October 27, 2026, the Plan Administrator filed the *Complaint for (I) Avoidance and Recovery of Transfers Pursuant to N.Y. Debtor & Creditor Law §§ 273, 274, 276 & 277 (II) Civil RICO Pursuant to 18 U.S.C. § 1962 and (III) Related Relief* [Case No. 26-50995, Docket No. 2] ("Complaint 3").

8. On November 2, 2026, the Plan Administrator filed the *Complaint for (I) Avoidance and Recovery of Transfers Pursuant to N.Y. Debtor & Creditor Law and the Connecticut Uniform Fraudulent Transfer Act (II) Civil RICO Pursuant to 18 U.S.C. § 1962 and (III) Related Relief* [Case No. 26-51108, Docket No. 2] ("Complaint 4").

9. On November 3, 2026, the Plan Administrator filed the *Complaint for (I) Avoidance and Recovery of Transfers Pursuant to N.Y. Debtor & Creditor Law and the Connecticut Uniform Fraudulent Transfer Act (II) Civil RICO Pursuant to 18 U.S.C. § 1962 and (III) Related Relief* [Case No. 26-51118, Docket No. 2] ("Complaint 5," and together with Complaint 1, Complaint 2, Complaint 3, and Complaint 4, the "Initial Complaints").

10. The Plan Administrator currently anticipates filing additional complaints against other parties involving facts, allegations, and causes of action similar to those included in the Initial Complaints (the "Future Complaints," and together with the Initial Complaints, the "Complaints").

11. The Complaints were, and will in the future, be filed under seal because they contain confidential and commercially sensitive information (the "Confidential Information"), including tax identification numbers, social security numbers, and nonpublic banking information, including account numbers, routing numbers, and other financial account identifiers.

RELIEF REQUESTED

12. The Plan Administrator seeks entry of the Proposed Order authorizing the Confidential Information in the Complaints to be filed under seal.

BASIS FOR RELIEF

13. Section 105(a) of the Bankruptcy Code codifies the Court's inherent equitable powers and empowers it to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code]" 11 U.S.C. § 105(a).

14. Section 107(b) of the Bankruptcy Code enables the Court to issue orders that protect parties from the potential harm that could result from disclosing confidential information:

> On request of a party in interest, the bankruptcy court shall, and on the bankruptcy court's own motion, the bankruptcy court may . . . protect an entity with respect to a trade secret or confidential research, development, or commercial information;

11 U.S.C. § 107(b). Additionally, Section 107(c) of the Bankruptcy Code provides that the Court may protect an individual's "means of identification," as defined in 18 U.S.C. 1028(d)[3], "to the extent that the court finds that the disclosure of such information would create undue risk of identity theft or other unlawful injury[.]" 11 U.S.C. § 107(c).

15. Sections 107(b) and (c) create an exception to the general rule that documents filed in chapter 11 cases are public records open to examination and protect entities from any potential harm that may be caused by the disclosure of certain confidential or commercial information.

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[3] The term "means of identification" means any name or number that may be used, alone or in conjunction with any other information, to identify a specific individual, including any—

(a) name, social security number, date of birth, official State or government issued driver's license or identification number, alien registration number, government passport number, employer or taxpayer identification number;

(b) unique biometric data, such as fingerprint, voice print, retina or iris image, or other unique physical representation;

(c) unique electronic identification number, address, or routing code; or

(d) telecommunication identifying information or access device (as defined in section 1029(e));

18 U.S.C. 1028(d).

16. Bankruptcy Rule 9018 establishes the procedures by which a party may seek relief to file a document under seal. Specifically, Bankruptcy Rule 9018 states:

> On motion or on its own, the court may, with or without notice, issue any order that justice requires to . . . protect the estate or any entity regarding a trade secret or other confidential research, development, or commercial information;

Fed. R. Bankr. P. 9018.

17. Further, Rule 9018-1(d) of the Local Rules provides, in relevant part, that "[a]ny filer seeking to file a document . . . under seal must file a motion requesting such relief[.]" Del. Bankr. L.R. 9018-1(d)(i).

18. Here, the Confidential Information the Plan Administrator seeks to seal contains both commercial information and personally identifying information, the public disclosure of which could harm commercial interests and compromise individual privacy.

19. In light of the risks associated with the public disclosure of personal information, courts in this District have recognized the need to protect information that could identify individual persons. In *In re FTX Trading Ltd.*, Judge Dorsey, referring to the definition of "means of identification" under 18 U.S.C. § 1028(d), as incorporated by Bankruptcy Code section 107(c), observed that the statute encompasses "names, numbers, or any combination" thereof that could be used to identify an individual. As Judge Dorsey explained, "the Criminal Code recognizes that disclosure of a name could result in the identification of an individual and if that individual needs protecting, we need to make sure that that is happening." *In re FTX Trading Ltd.*, No. 22-11068 (JTD) (Bankr. D. Del. Jan. 13, 2023), D.I. 489 (Jan. 11, 2023 Hr'g Tr. at 103:24-104:5); *see also In re Endo Int'l plc*, No. 22-22549 (JLG), 2022 WL 16640880, at *10 (Bankr. S.D.N.Y. Nov. 2, 2022) (authorizing the redaction of creditors' names and other identifying information and recognizing that "identity theft is a world-wide problem"). Accordingly, courts have consistently

recognized that protecting personally identifying information from public disclosure serves an important privacy interest and is appropriate under section 107(c) of the Bankruptcy Code.

20. Courts in this district have defined "commercial information" as "information which would result in 'an unfair advantage to competitors by providing them information as to the commercial operations of the debtor.'" *In re Alterra Healthcare Corp.*, 353 B.R. 66, 75 (Bankr. D. Del. 2006) (quoting *In re Orion Pictures Corp.*, 21 F.3d 24, 27–28 (2d. Cir. 1994)); *In re Muma Servs., Inc.*, 279 B.R. 478, 484 (Bankr. D. Del. 2002) (noting that section 107(b) "was intended to avoid affording an unfair advantage to competitors by providing them information as to the commercial operations of the debtor") (internal citations omitted). Further, confidential commercial information need not rise to the level of a trade secret to be entitled to protection under section 107(b). *See, e.g., Orion Pictures*, 21 F.3d at 28 ("[C]ourts interpreting section 107(b) need not require that commercial information be the equivalent of a trade secret before protecting such information.").

21. Once a Court determines that an interested party is requesting to seal or redact information covered by section 107(b) of the Bankruptcy Code, "the court is *required* to protect a requesting party and has no discretion to deny the application." *Id.* at 27 (emphasis in original). The Court has broad authority to issue such an order under Bankruptcy Rule 9018. *See In re Global Crossing Ltd.*, 295 B.R. 720, 724 (Bankr. S.D.N.Y. 2003) ("When the requirements of Rule 9018 are satisfied, the authority to issue the resulting order is broad—'any order which justice requires.' The Court notes that the authority goes not just to the protection of confidential documents, but to other confidentiality restrictions that are warranted in the interests of justice.").

22. Sufficient grounds exist for the Court to grant the relief requested herein. The Plan Administrator submits that the Confidential Information should be kept confidential because such

information constitutes "commercial information" within the meaning of 107(b) of the Bankruptcy Code and "means of identification" within the meaning of section 107(c) of the Bankruptcy Code and 18 U.S.C. 1028(d). The Confidential Information contains tax identification numbers, social security numbers, and nonpublic banking information, including account numbers, routing numbers, and other financial identifiers. Disclosure of the Confidential Information could expose sensitive personal and financial information and would serve no legitimate public purpose.

23. Recognizing that both transparency and public scrutiny are key elements of the bankruptcy process, the Plan Administrator seeks only to redact the Confidential Information. The proposed redactions are necessary to protect personal information and nonpublic banking information, both of which could be used unlawfully if exposed.

24. The Plan Administrator respectfully requests that the Court permit him to file the Confidential Information under seal, thereby preventing potential harm that could arise from disclosing the Confidential Information.

CERTIFICATION OF COUNSEL PURSUANT TO LOCAL RULE 9018-1

25. The undersigned counsel hereby certifies, pursuant to Local Rule 9018-1(d), that it is unnecessary for the Plan Administrator to confer with the parties whose information is sought to be redacted because such information is so inherently sensitive and the proposed redactions are sufficiently narrow as to obviate the need to confer with the applicable parties about the scope and need for redaction. Additionally, in accordance with Local Rule 9018-1(d), the Plan Administrator will file publicly viewable redacted versions of the Complaints.

NOTICE

26. The Plan Administrator will provide notice of this motion to all parties that have filed a notice of appearance and request for service of papers pursuant to Bankruptcy Rule 2002.

In light of the nature of the relief requested herein, the Plan Administrator submits that no other or further notice is necessary.

CONCLUSION

WHEREFORE, the Plan Administrator respectfully requests that the Court enter the Proposed Order.

Dated: November 5, 2026
Wilmington, Delaware

QUINN EMANUEL URQUHART & SULLIVAN, LLP
Susheel Kirpalani (admitted *pro hac vice*)
Benjamin Finestone (admitted *pro hac vice*)
Kate Scherling (admitted pro hac vice)
Daniel Holzman (admitted *pro hac vice*)
295 Fifth Avenue
New York, New York 10016
Telephone: (212) 849-7000
susheelkirpalani@quinnemanuel.com
benjaminfinestone@quinnemanuel.com
katescherling@quinnemanuel.com
danielholzman@quinnemanuel.com

Counsel for the Plan Administrator

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Katherine Majewski
Robert S. Brady (Del. No. 2847)
Kenneth J. Enos (Del. No. 4544)
Jared W. Kochenash (Del. No. 6557)
Katherine Majewski (Del No. 7623)
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
rbrady@ycst.com
kenos@ycst.com
jkochenash@ycst.com
kmajewski@ycst.com

Counsel for the Plan Administrator

EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: SAGA FORMATIONS, INC.,[1] Debtor.	Chapter 11 Case No. 24-11161 (BLS) **Docket Ref. No. _____**
NICHOLAS RUBIN, PLAN ADMINISTRATOR, Plaintiff, v. BMF ADVANCE LLC, REDSTONE ADVANCE, INC., CHEETAH CAPITAL INC., HOP CAPITAL, FUNDERZ.NET LLC, JOSEPH YITZCHAKOV (a/k/a JOSEPH ISAACOV, a/k/a JOSEPH ISAACOFF), GAVRIEL YITZCHAKOV (a/k/a GABRIEL ISAACOV), AND JOHN DOES 1-10, Defendants.	Adv. Pro. No. 26-50979 (BLS)
NICHOLAS RUBIN, PLAN ADMINISTRATOR, Plaintiff, v. ITRIA VENTURES LLC, BIZ2CREDIT INC., AND JOHN DOES 1-10, Defendants.	Adv. Pro. No. 26-50975 (BLS)

[1] The last four digits of Saga Formations, Inc. f/k/a Epic Creations, Inc. federal tax identification number are 9113. In addition to the foregoing Debtor, the "Debtors" include certain affiliated entities, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Debtors' claims and noticing agent at https://www.veritaglobal.net/epiccreations. All motions, contested matters, and adversary proceedings that remained open as of the closing of such cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Saga Formations, Inc., Case No. 24-11161 (BLS).

NICHOLAS RUBIN, PLAN ADMINISTRATOR, Plaintiff, v. SMART BUSINESS FUNDING, COLLINS CASH INC., ABRAHAM COHEN (a/k/a ABRAHAM COLLIN, a/k/a ANTHONY COLLIN) AND JOHN DOES 1-10, Defendants.	Adv. Pro. No. 26-50995 (BLS)
NICHOLAS RUBIN, PLAN ADMINISTRATOR, Plaintiff, v. AMERIFI CAPITAL LLC, WYNWOOD CAPITAL GROUP, LLC (D/B/A AMERIFI CAPITAL; D/B/A GEKO CAPITAL FUND), YOEL TEITELBAUM (A/K/A JOEL TEITELBAUM, A/K/A JOE TEITELBAUM), DAVID SULAYMANOV (A/K/A DAVID SALOMON), AND JOHN DOES 1-10, Defendants.	Adv. Pro. No. 26-51108 (BLS)
NICHOLAS RUBIN, PLAN ADMINISTRATOR, Plaintiff, v. FUNDERS APP LLC (D/B/A 24 CAPITAL, D/B/A SYMPLIFI CAPITAL, D/B/A MR. ADVANCE), 24 CAPITAL LLC, MR. ADVANCE LLC, SECURE CAPITAL FUNDING LLC, DC FUND LLC (D/B/A SECURE CAPITAL), MARK ALLAYEV, JONATHAN ALLAYEV, AND JOHN DOES 1-10, Defendants.	Adv. Pro. No. 26-51118 (BLS)

ORDER (I) AUTHORIZING THE FILING UNDER SEAL OF COMPLAINTS CONTAINING CERTAIN CONFIDENTIAL INFORMATION AND (II) GRANTING RELATED RELIEF

Upon consideration of the *Plan Administrator's Motion for an Order (I) Authorizing the Filing Under Seal of Complaints Containing Certain Confidential Information and (II) Granting Related Relief* (the "Motion")[2] for entry of an order (this "Order") pursuant to sections 105(a), 107(b), and 107(c) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1(d), authorizing the filing of the Complaints under seal; and upon consideration of the Motion and pleadings related thereto; and due and proper notice of the Motion having been given; and having determined that no other or further notice of the Motion is required; and having determined that this Court has jurisdiction to consider the Motion 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; and having determined that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and having determined that venue of this proceeding and the Motion is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED**, as set forth herein.

2. Pursuant to sections 107(b) and 107(c) of and Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1, the Plan Administrator is authorized to (i) file the Complaints under seal and (ii) file redacted versions of the Complaints. Absent an order of this Court to the contrary, any subsequent pleadings that include or reference the Confidential Information shall also redact

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

the Confidential Information to preserve the confidentiality of such information, and in accordance with Local Rule 9018-1(e), the Plan Administrator shall include the docket number of this Order on any future filings under seal.

3. The Confidential Information shall remain confidential, and shall not be made available to anyone, except to: (i) this Court; (ii) the Clerk of this Court; and (iii) by agreement with the Plan Administrator or as may be further directed by order of this Court, which parties shall keep the Confidential Information therein strictly confidential.

4. Any party who receives the unredacted Complaints in accordance with this Order shall not disclose or otherwise disseminate the unredacted Complaints, or the information contained therein, to any other person or entity.

5. Notwithstanding the provisions of Bankruptcy Rule 6004(h), this Order shall be immediately effective and enforceable upon its entry.

6. The Plan Administrator is authorized to take all actions necessary and appropriate to carry out the relief granted in this Order.

7. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
SAGA FORMATIONS, INC.,[1]	Case No. 24-11161 (BLS)
Debtor.	
	Objection Deadline: **November 19, 2026 at 4:00 p.m. (ET)**
	Hearing Date: **TBD**

NOTICE OF MOTION

PLEASE TAKE NOTICE that Nicholas Rubin, in his sole capacity as the plan administrator (the "Plan Administrator") for the above-captioned post-effective date debtors (the "Debtors") has filed the *Plan Administrator's Motion for an Order (I) Authorizing the Filing Under Seal of Complaints Containing Certain Confidential Information and (II) Granting Related Relief* (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be filed on or before **November 19, 2026 at 4:00 p.m. (ET)** (the "Objection 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, you must serve a copy of the objection or response to the Motion upon the undersigned counsel to the Plan Administrator so as to be received on or before the Objection Deadline.

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

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Dated: November 5, 2026
Wilmington, Delaware

QUINN EMANUEL URQUHART & SULLIVAN, LLP
Susheel Kirpalani (admitted *pro hac vice*)
Benjamin Finestone (admitted *pro hac vice*)
Kate Scherling (admitted *pro hac vice*)
Daniel Holzman (admitted *pro hac vice*)
295 Fifth Avenue
New York, New York 10016
Telephone: (212) 849-7000
susheelkirpalani@quinnemanuel.com
benjaminfinestone@quinnemanuel.com
katescherling@quinnemanuel.com
danielholzman@quinnemanuel.com

Counsel for the Plan Administrator

/s/ Katherine Majewski
YOUNG CONAWAY STARGATT & TAYLOR, LLP
Robert S. Brady (Del. No. 2847)
Kenneth J. Enos (Del. No. 4544)
Jared W. Kochenash (Del. No. 6557)
Katherine Majewski (Del. No. 7623)
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
rbrady@ycst.com
kenos@ycst.com
jkochenash@ycst.com
kmajewski@ycst.com

Counsel for the Plan Administrator