Docket #0085 Date Filed: 08/04/2026

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Proposed Attorneys for Debtors

In re:

POOLIN TECHNOLOGY PTE. LTD., *et al.*, [1]

Debtors.

Case No. 26-18325 (EJO)

Chapter 11

(Jointly Administered)

Judge: Eamonn J. O'Hagan

Hearing Date: September 16, 2026 at 11:00 AM
Objection Deadline: September 9, 2026

NOTICE OF DEBTORS' MOTION FOR ENTRY OF AN ORDER EXTENDING TIME TO FILE SCHEDULES AND STATEMENTS AND GRANTING RELATED RELIEF

PLEASE TAKE NOTICE that a hearing on the *Debtors' Motion for Entry of an Order Extending Time to File Schedules and Statements and Granting Related Relief* (the "Motion") will be held on September 16, 2026, at 11 a.m. (prevailing Eastern Time), or as soon thereafter as

[1] The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtors' federal tax identification number, are: Poolin Technology Pte. Ltd., a Singapore Private Limited Company; Lonestar Dream Inc. (5105); and Lonestar Taproot LLC (4118). The location of the Debtors' service address for purposes of these Chapter 11 Cases is: c/o Michael DuFrayne, CRO, 2564 US Highway 1, PMB #16884166, Lawrence, NJ 08648.

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counsel may be heard (the "Hearing"), before the Honorable Eamonn J. O'Hagan. Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in the bankruptcy case. If you do not have an attorney, you may wish to consult one. The Debtors will rely upon the attached Motion. A Certificate of Service is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that the Hearing on the Motion will be conducted remotely and in person. Instructions to access the remote hearing can be found on the website for the Debtors' claims and noticing agent at: https://www.veritaglobal.net/Poolin and in the Judge's procedures available at: https://www.njb.uscourts.gov/content/honorable-eamonn-ohagan.

PLEASE TAKE FURTHER NOTICE that the Motion sets forth the relevant legal and factual bases upon which the relief requested should be granted. A proposed order granting the relief requested in the Motion is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; (iii) be filed with the Clerk of the United States Bankruptcy Court for the District of New Jersey (the "Bankruptcy Court") electronically by attorneys who regularly practice before the Bankruptcy Court, in accordance with the *General Order Regarding Electronic Means for Filing, Signing, and Verification of Documents* dated March 27, 2002 (the "General Order"), and the *Commentary Supplementing Administrative Procedures* dated as of March 2004 (the "Supplemental Commentary") (the General Order, the Supplemental Commentary, and the User's Manual for the Electronic Case Filing System can be found at www.njb.uscourts.gov, the official website for the Bankruptcy Court); and by all other parties-in-interest, in Portable Document Format (PDF); (iv) be served on all parties-in-interest and in accordance with the Local Rules for the United States Bankruptcy Court for the District of New Jersey, Federal Rules of Bankruptcy Procedure, the

General Order, and the Supplemental Commentary, so as to be received **on or before September 16, 2026** (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that only those responses or objections that are timely filed, served, and received will be considered at the Hearing. Failure to file a timely objection may result in entry of a final order granting the Motion as requested by the Debtors.

PLEASE TAKE FURTHER NOTICE that, unless objections are timely and properly filed and served, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that copies of all documents filed in these Chapter 11 Cases may be obtained free of charge by visiting the website of the Debtors' claims and noticing agent, Verita Global, at https://www.veritaglobal.net/Poolin. You may also obtain copies of any pleadings by visiting the Court's website at https://www.njb.uscourts.gov in accordance with the procedures and fees set forth therein.

Dated: August 4, 2026

ARCHER & GREINER, P.C.

/s/ Stephen M. Packman

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[2] Admitted *Pro Hac Vice*.

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DEBTORS' MOTION FOR ENTRY OF AN ORDER EXTENDING TIME TO FILE SCHEDULES AND STATEMENTS AND GRANTING RELATED RELIEF

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Poolin Technology Pte. Ltd. ("Poolin") and its affiliated debtors and debtors-in-possession: Lonestar Dream Inc. ("LSD"); and Lonestar Taproot, LLC ("LST" and collectively, the

[1] The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtors' federal tax identification number, are: Poolin Technology Pte. Ltd., a Singapore Private Limited Company; Lonestar Dream Inc. (5105); and Lonestar Taproot LLC (4118). The location of the Debtors' service address for purposes of these Chapter 11 Cases is: c/o Michael DuFrayne, CRO, 2564 US Highway 1, PMB #16884166, Lawrence, NJ 08648.

"Debtors"), by and through their undersigned proposed counsel, hereby respectfully move (this "Motion") this Court for entry of an order substantially in the form attached hereto as **Exhibit A** (the "Proposed Order") (i) extending the deadline by which the Debtors must file their schedules of assets and liabilities, schedules of executory contracts and unexpired leases, and statements of financial affairs (collectively, the "Schedules and Statements") by thirty (30) calendar days, for a total of forty-four (44) calendar days from the Petition Date (as defined below) through and including September 4, 2026, without prejudice to the Debtors' ability to request additional extensions for cause shown, and (ii) granting related relief. In support of this Motion, the Debtors respectfully state as follows:

JURISDICTION AND VENUE

1. The Court (defined below) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference from the United States District Court For The District Of New Jersey*, entered July 23, 1984, and amended on June 6, 2025 (Bumb C.J.). The Debtors hereby consent, pursuant to Bankruptcy Rule 7008, 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 of this proceeding and this Motion is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested herein are sections 105(a) and 521 of Title 11 of the United States Code (the "Bankruptcy Code"), Rules 1007(c) and 9006(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Local Rule 9013-6 of the

Local Rules of the United States Bankruptcy Court for the District of New Jersey (the "Local Rules").

GENERAL BACKGROUND

4. On July 22, 2026 (the "Petition Date"), the Debtors each filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of New Jersey (the "Court"), thereby commencing the above-captioned cases (these "Cases" or the "Chapter 11 Cases"). As of the filing of this Motion, no official committee of unsecured creditors or statutory committee has been appointed in the Debtors' Cases, and no request has been made for the appointment of a trustee or examiner.

5. Additional factual background regarding the Debtors' current and historical business operations and the events leading to these Chapter 11 Cases is set forth in the *Declaration of Michael DuFrayne in Support of Debtors' Chapter 11 Petitions and First Day Motions* [ECF No. 2] (the "First Day Declaration") which is fully incorporated by reference herein.

RELIEF REQUESTED

6. The Debtors seek an extension of the deadline by which they must file their Schedules and Statements by thirty (30) calendar days, for a total of forty-four (44) calendar days from the Petition Date through and including September 4, 2026.

BASIS FOR THE RELIEF REQUESTED

7. Section 521 of the Bankruptcy Code and Bankruptcy Rule 1007(c) require a debtor to file its Schedules and Statements within fourteen (14) days of its petition date. *See* 11 U.S.C. § 521; Fed. R. Bankr. P. 1007(c). However, pursuant to Bankruptcy Rules 1007(c) and 9006(b), the Court has authority to extend the time required for the filing of the Schedules and Statements "for cause shown." Fed. R. Bankr. P. 1007(c) and 9006(b). Showing "cause" merely requires that

a debtor "demonstrate some justification for the issuance of the order" and bankruptcy courts will normally grant such extensions "in the absence of bad faith or prejudice to the adverse party." *Bryant v. Smith*, 165 B.R. 176, 182 (W.D. Va. 1994) (discussing the standard for granting extensions under Bankruptcy Rule 1007) (internal citations and quotation marks omitted).

8. The Debtors are working diligently with their retained professionals to compile the information required for the Schedules and Statements under Section 521 of the Bankruptcy Code and Bankruptcy Rule 1007(c). Nevertheless, good and sufficient cause exists for an extension of time to file the Schedules and Statements based upon, among other things, the complexity of the Debtors' Cases and the burdens imposed on the Debtors' management and professional advisors in the early days of these Chapter 11 Cases.

9. Preparation of the Schedules and Statements requires compiling voluminous information from books, records, and documents relating to over 11,000 creditors with potential claims, and assets which have substantial value, in a form readily translatable to the format required by the Bankruptcy Rules. Compiling and adapting this information will require significant time and effort from the Debtors, their employees, and their restructuring advisors—resources better directed toward the immediate needs of the Debtors' Chapter 11 Cases, including negotiations with key stakeholders and the proposed sale process. Accordingly, the Debtors may not be in a position to properly and accurately complete the Schedules and Statements within the default time allotted.

10. In the days leading up to the Petition Date, the Debtors' primary focus was on preparing for these chapter 11 filings on an expedited basis. The Debtors intend to focus the attention of key personnel on chapter 11 compliance issues during the early days of these Chapter 11 Cases, including negotiating with key counterparties and stakeholders in pursuit of value-

maximizing transactions for the benefit of creditors of the estate. Such efforts will facilitate the Debtors' utilization of chapter 11 for the benefit of all stakeholders.

11. Moreover, granting an extension will not harm creditors or other parties in interest because the Debtors will file the Schedules and Statements well in advance of any deadline for filing proofs of claim in these Chapter 11 Cases. Likewise, the Debtors submit that the relief requested herein will not prejudice or adversely affect the rights of the Debtors' creditors or other parties in interest because the extension requested will aid the Debtors' efforts to ensure the accuracy and completeness of the Schedules and Statements, which in turn will promote efficient administration of these Chapter 11 Cases and ultimately benefit the Debtors' creditors and other parties in interest.

12. Out of an abundance of caution, the Debtors request up to thirty (30) additional calendar days to complete the Schedules and Statements, without prejudice to the Debtors' right to request further extensions for cause shown. Given the extensive amount of information that must be assembled, the form and manner in which the relevant information is stored in the ordinary course of the Debtors' business, the other critical matters demanding the attention of the Debtors and their professionals, and professional hours required to complete the Schedules and Statements, the Debtors submit there is good and sufficient cause for granting the requested extension of time.

13. Courts in this and other districts routinely grant similar relief to that requested herein. *See, e.g.*, *In Re New Rite Aid, LLC*, No. 25-14861(MBK) (Bankr. D.N.J. May 7, 2025) (granting debtors a total of 42 calendar days from the petition date to file their schedules and statements); *In re Sam Ash Music Corp.*, No. 24-14727 (SLM) (Bankr. D.N.J. May 10, 2024) (granting debtors a total of 35 calendar days from the petition date to file their schedules and statements); *In re Thrasio Holdings, Inc.*, No. 24-11840 (CMG) (Bankr. D.N.J. Mar. 1, 2024)

(granting debtors a total of 40 calendar days from the petition date to file their schedules and statements); *In re Invitae Corp.*, No. 24-11362 (MBK) (Bankr. D.N.J. Feb. 16, 2024) (granting debtors a total of 34 calendar days from the petition date to file their schedules and statements); *In re Careismatic Brands, LLC*, No. 24-10561 (VFP) (Bankr. D.N.J. Jan. 24, 2024) (granting debtors a total of 50 calendar days from the petition date to file their schedules and statements); *In re Rite Aid Corp.*, No. 23-18993 (MBK) (Bankr. D.N.J. Oct. 19, 2023) (granting debtors a total of 52 calendar days from the petition date to file their schedules and statements); *In re Cyxtera Technologies, Inc.*, No. 23-14853 (JKS) (Bankr. D.N.J. June 6, 2023) (granting debtors a total of 36 days from the petition date to file their schedules and statements); *In re Bed Bath & Beyond, Inc.*, No. 23-13359 (VFP) (Bankr. D.N.J. Apr. 25, 2023) (granting debtors a total of 37 days from the petition date to file their schedules and statements); *In re David's Bridal, LLC*, No. 23-13131 (CMG) (Bankr. D.N.J. Apr. 17, 2023) (granting debtors a total of 35 days from the petition date to file their schedules and statements); *In re BlockFi, Inc.*, No. 22-19361 (MBK) (Bankr. D.N.J. Nov. 29, 2022) (granting debtors a total of 44 days from the petition date to file their schedules and statements); *In re Nat'l Realty Inv. Advisors, LLC*, No. 22-14539 (JKS) (Bankr. D.N.J. June 9, 2022) (same); and *In re Modell's Sporting Goods, Inc.*, No. 20-14179 (VFP) (Bankr. D.N.J. Mar. 13, 2020) (granting debtors a total of 35 days from the petition date to file their schedules and statements).

14. Therefore, the Debtors request that the Court extend the fourteen-day period for an additional thirty (30) calendar days without prejudice to the Debtors' ability to request further extensions.

IMMEDIATE RELIEF REQUESTED

15. Pursuant to Bankruptcy Rule 6003, the Court may grant relief within twenty-one (21) days after the filing of the petition if such relief is necessary to avoid immediate and irreparable harm. For the reasons set forth above, the Debtors submit that the relief requested in this Motion is necessary to avoid immediate and irreparable harm to the Debtors and their respective estates and creditors. Particularly, the Debtors will likely not be able to produce complete and accurate Schedules and Statements within the initial fourteen-day period following the Petition Date, and the failure to obtain an extension will impair the Debtors' ability to devote resources to critical restructuring matters at this critical juncture, in turn, preserving and maximizing the value of the Debtors' estates for the benefit of all stakeholders. Accordingly, the Debtors submit that they have satisfied the "immediate and irreparable harm" standard of Bankruptcy Rule 6003 and, therefore, respectfully request that the Court approve the relief requested in this Motion.

WAIVER OF BANKRUPTCY RULES 6004(a) AND (h)

16. The Debtors request that the Court determine that the relief requested in this Motion complies with Bankruptcy Rule 6003 and that waiver of Bankruptcy Rules 6004(a) and (h) is appropriate. As explained above and in the First Day Decl. and herein, the Debtors will likely not be able to produce complete and accurate Schedules and Statements within the initial fourteen-day period following the Petition Date. As a result, the Debtors respectfully submit that they have satisfied the "immediate and irreparable harm" standard of Bankruptcy Rule 6003. Further, as set forth above, the Debtors submit that granting this Motion such that it is effective immediately is essential to prevent irreparable damage to the Debtors and their estates. Accordingly, ample cause exists to justify the waiver of the notice requirements under Bankruptcy Rule 6004(a) and the

fourteen (14)-day stay imposed by Bankruptcy Rule 6004(h), to the extent such notice requirements and such stay apply.

WAIVER OF MEMORANDUM OF LAW

17. The Debtors respectfully request that the Court waive the requirement to file a separate memorandum of law pursuant to Local Rule 9013-1(a)(3) because the legal basis upon which the Debtors rely is set forth herein and the Motion does not raise any novel issues of law.

NO PRIOR REQUEST

18. No prior motion for the relief requested herein has been made to this or any other court.

NOTICE

19. Pursuant to Local Rule 9013-5(f), notice of this Motion will be provided to the following parties: (i) the Office of the United States Trustee for the District of New Jersey; (ii) any statutory committee appointed in these Cases; (iii) the Debtors' consolidated list of top thirty (30) unsecured creditors; (iv) the Internal Revenue Service; (v) the United States Attorney's Office for the District of New Jersey; (vi) the financial institutions at which the Debtors maintain the bank accounts identified herein; (vii) counsel for the Stalking Horse Purchasers; and (viii) any other party entitled to notice pursuant to Bankruptcy Rule 2002 and Local Rule 9013-5. The Debtors submit that such notice is sufficient, and no further notice need be provided.

CONCLUSION

WHEREFORE, the Debtors respectfully request that the Court enter an order substantially in the form submitted herewith: (i) extending the deadline by which the Debtors must file their Schedules and Statements by thirty (30) calendar days, for a total of forty-four (44) calendar days from the Petition Date through and including September 4, 2026, without prejudice to the Debtors'

ability to request additional extensions for cause shown, and (ii) granting such other and further relief as the Court deems just and proper.

Dated: August 4, 2026

ARCHER & GREINER, P.C.

/s/ Stephen M. Packman

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Proposed Counsel to the Debtors

[2] Admitted *Pro Hac Vice*.

EXHIBIT A
(Proposed Order)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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Proposed Attorneys for Debtors

In re: POOLIN TECHNOLOGY PTE. LTD., *et al.*, [1] Debtors.	Case No. 26-18325 (EJO) Chapter 11 (Jointly Administered) Judge: Eamonn J. O'Hagan

ORDER EXTENDING TIME TO FILE SCHEDULES AND STATEMENTS AND GRANTING RELATED RELIEF

The relief set forth on the following pages, numbered two (2) through three (3), is **ORDERED**.

[1] The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtors' federal tax identification number, are: Poolin Technology Pte. Ltd., a Singapore Private Limited Company; Lonestar Dream Inc. (5105); and Lonestar Taproot LLC (4118). The location of the Debtors' service address for purposes of these Chapter 11 Cases is: c/o Michael DuFrayne, CRO, 2564 US Highway 1, PMB #16884166, Lawrence, NJ 08648.

Upon consideration of the Motion (the "Motion")[1] of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order (this "Order") (i) extending the deadline by which the Debtors must file their Schedules and Statements by thirty (30) calendar days, for a total of forty-four (44) calendar days from the Petition Date through and including September 4, 2026, without prejudice to the Debtors' ability to request additional extensions for cause shown, and (ii) granting such other and further relief as more fully set forth in the Motion; and upon the *Declaration of Michael DuFrayne in Support of Debtors' Chapter 11 Petitions and First Day Motions* [ECF No. 2] (the "First Day Declaration"); and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference to the Bankruptcy Court Under Title 11*, entered July 23, 1984, and amended on June 6, 2025 (Bumb, C.J.); and this Court having found that it 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 Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate and that no other notice need be provided under the circumstances; and this Court having determined that the legal and factual bases set forth in the Motion and at the hearing thereon establish just cause for the relief granted herein; and upon all of the proceedings 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.

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

2. Pursuant to section 521 of the Bankruptcy Code and Bankruptcy Rules 1007(c) and 9006(b), the time within which the Debtors must file their Schedules and Statements is extended by thirty (30) calendar days, through and including September 4, 2026, without prejudice to the Debtors' right to seek additional extensions.

3. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

4. Notice of the Motion, as provided therein, shall be deemed good and sufficient notice of the Motion, and the requirements of the Bankruptcy Rules and the Local Rules are satisfied by such notice.

5. The requirement set forth in Local Rule 9013-1(a)(3) that any motion be accompanied by a memorandum of law is hereby deemed satisfied by the contents of the Motion or otherwise waived.

6. To the extent applicable, the requirements set forth by Bankruptcy Rules 6003 and 6004 are satisfied, and this Order shall be effective immediately upon entry.

7. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

8. Any party may move for modification of this Order upon notice to the U.S. Trustee, counsel to the Debtors, and counsel to any statutory committee appointed in these Chapter 11 Cases.

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