UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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

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Attorneys for Debtors

In re:

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

Debtors.

Chapter 11

Case No. 26-18325 (EJO)

(Jointly Administered)

Judge: Eamonn J. O'Hagan

Hearing Date: December 2, 2026 at 10:00 a.m. ET
Objection Deadline: November 25, 2026

NOTICE OF DEBTORS' MOTION FOR AN ORDER, PURSUANT TO SECTION 1121(d) OF THE BANKRUPTCY CODE, EXTENDING THE EXCLUSIVE PERIODS WITHIN WHICH THE DEBTORS MAY FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF AND GRANTING RELATED RELIEF

PLEASE TAKE NOTICE that a hearing on the Debtors' Motion for an Order, Pursuant to Section 1121(d) of the Bankruptcy Code, Extending the Exclusive Periods Within Which 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 #16884116, Lawrence, NJ 08648.

Debtors May File a Chapter 11 Plan and Solicit Acceptances Thereof and Granting Related Relief (the "Motion")[2] will be held on **December 2, 2026** at **10:00 a.m.** (prevailing Eastern Time), or as soon thereafter as counsel may be heard (the "Hearing"), before the Honorable Eamonn J. O'Hagan, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, N.J. 08608, Courtroom #2. 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.)

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to enter an Order granting the relief requested in the Motion, or if you want the Court to consider your views on an objection, then on or before **November 25, 2026**, you or your attorney must file with the Court a written request for a hearing or response or answer explaining your position at the:

United States Bankruptcy Court for
the District of New Jersey
Clarkson S. Fisher U.S. Courthouse
402 East State Street
Trenton, NJ 08608

If you mail your request/response to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above, and you must also serve a copy upon:

i. Counsel for the Debtors, Archer & Greiner, P.C., Stephen M. Packman, Esquire (spackman@archerlaw.com), Douglas G. Leney, Esquire (dleney@archerlaw.com), Natasha M. Songonuga, Esquire (nsongonuga@archerlaw.com), and Alexander J. Andrews, Esquire (aandrews@archerlaw.com), 1025 Laurel Oak Road, Voorhees, NJ 08043;

ii. Office of the U.S. Trustee for the District of New Jersey, Attn: Rachel Wolf, Esquire (rachel.wolf@usdoj.gov) and Jeffrey M. Sponder, Esquire (jeffrey.m.sponder@usdoj.gov), U.S. Department of Justice, One Newark Center, Suite 2100, Newark, NJ 07102; and

iii. Counsel for the Official Committee of Unsecured Creditors, Pachulski Stang Ziehl & Jones, LLP, Attn: Bradford J. Sandler, Esquire

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

(bsandler@pszjlaw.com), Robert J. Feinstein, Esquire (rfeinstein@pszjlaw.com), and Shirley S. Cho, Esquire (scho@pszjlaw.com), 919 N. Market Street, 17th Floor, Wilmington, DE 19801.

You must attend the hearing scheduled to be held before the Honorable Eamonn J. O'Hagan, United States Bankruptcy Judge on **December 2, 2026, at 10:00 A.M. (ET)** in person or remotely. 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 Court's procedures available at: https://www.njb.uscourts.gov/content/honorable-eamonn-ohagan. If you do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an Order granting the Motion.

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: October 30, 2026

ARCHER & GREINER, P.C.

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DEBTORS' MOTION FOR AN ORDER, PURSUANT TO SECTION 1121(d) OF THE BANKRUPTCY CODE, EXTENDING THE EXCLUSIVE PERIODS WITHIN WHICH THE DEBTORS MAY FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF 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 ("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 #16884116, Lawrence, NJ 08648.

"Debtors"), by and through their undersigned counsel, hereby respectfully move (this "Motion") for entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), pursuant to section 1121(d) of title 11 of the United States Code (the "Bankruptcy Code") and rule 9006(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), (a) extending the periods during which the Debtors have the exclusive right to (i) file a chapter 11 plan (the "Exclusive Filing Period"), and (ii) solicit acceptances thereof (the "Exclusive Solicitation Period," and together with the Exclusive Filing Period, the "Exclusive Periods"), in each case, by 120 days, from November 19, 2026 and January 18, 2027, respectively, through and including March 19, 2027 and May18, 2027, respectively, without prejudice to the Debtors' rights to request further extensions of such periods in accordance with section 1121(d); and (b) granting the Debtors such other and further relief as is just. In further support of the Motion, the Debtors respectfully state as follows:

PRELIMINARY STATEMENT

1. The Debtors currently hold the exclusive right to file a plan and solicit acceptances pursuant to section 1121 of the Bankruptcy Code through November 19, 2026, and January 18, 2027. By this Motion, the Debtors respectfully request an extension of the Exclusive Periods by 120 days—specifically, the Exclusive Filing Period from November 19, 2026, through and including March 19, 2027, and the Exclusive Solicitation Period from January 18, 2027 through and including May 18, 2027. This is the Debtors' first request for an extension of exclusivity in these Chapter 11 Cases (as defined below). This requested extension is without prejudice to the Debtors' ability to seek further extensions should circumstances warrant.

2. Good cause exists for the extensions requested hereby. Since the Petition Date (as defined below), the Debtors, with the assistance of their professionals and advisors, working with the Committee (as defined below) and their professionals, have acted diligently and in good faith

to address key priorities with stakeholders to maximize the value of the Debtors' estates ("Estates").

3. The Debtors marketed their assets ("Assets") and conducted a highly competitive auction process resulting in the Court (as defined below) approving the sale ("Sale") of the Assets to Hut 8 Corp. (by and through its designee affiliates, defined herein as the "Purchasers"). The Debtors are now working toward closing the subject sale transactions ("Sale Transactions").

4. In addition, the Debtors have (i) obtained operational and administrative relief to preserve value of the Estates, (ii) conducted an orderly wind-down of their operations, (iii) obtained first- and second-day relief, (iv) filed their schedules and statements of financial affairs, (v) obtained Court approval for settlements and the corresponding rejection or termination of burdensome contracts, (vi) filed a motion to set a claims bar date, (vii) kept current on their administrative expense obligations and (viii) preliminarily discussed with Committee professionals the prospect for a consensual plan. Each of these steps has been essential to positioning the Debtors to formulate and propose a chapter 11 plan.

5. Granting the requested extension will further the objectives of the Bankruptcy Code by affording the Debtors the reasonable opportunity Congress intended to propose a confirmable plan that is fair to creditors, preserves and maximizes the Estates' values, and provides a path to resolution of these Chapter 11 Cases. Conversely, denying the extension at this juncture would risk disrupting the significant progress already made, create unnecessary instability, and potentially impair recoveries for creditors.

6. The Debtors respectfully submit that the requested extension of the Exclusive Periods is both warranted and appropriate.

JURISDICTION AND VENUE

7. The Court 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 an 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 orders or judgments in connection herewith consistent with Article III of the United States Constitution.

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

9. The statutory predicates for the relief requested herein are section 1121(d) of the Bankruptcy Code, Bankruptcy Rule 9006(b), and Rules 9013-1, 9013-2, and 9013-6 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the "Local Rules").

FACTUAL AND PROCEDURAL BACKGROUND

10. 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 these "Chapter 11 Cases").

11. The Debtors continue to manage their Assets as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

12. On August 12, 2026, the Office of the United States Trustee for the District of New Jersey appointed the Official Committee of Unsecured Creditors (the "Committee"). *See Notice of Appointment of Official Committee of Unsecured Creditors* [Docket No. 112].

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

14. The Debtors filed their Schedules and Statements of Financial Affairs on September 4, 2026. *See* Case No. 26-18325 [Poolin], Docket No. 202; Case No. 26-18326 [LST], Docket No. 8; Case No. 26-18327 [LSD], Docket No. 8 (collectively, the "Schedules").[2]

15. Prior to cessation of business operations on July 10, 2026, LSD had two core business segments: mining digital assets for its own account and providing top-tier equipment hosting services at its Mining Facilities (as defined below) for other large-scale mining clients, utilizing advanced technologies like air cooling, hydro cooling, and a proprietary immersion cooling system. As part of its operations, LSD operated two Mining Facilities: a "land leased" facility located at 4143 N. US Highway 285, Pecos, Texas 79772 (the "Tarbush Facility"), and an owned facility located at 3072 FM 1927 Pyote, Texas 79777 (the "Pyote Facility" and with the Tarbush Facility, collectively, the "Mining Facilities").

16. On July 27, 2026, the Court entered that certain *Complex Case Management Order* [Docket No. 49] (the "Procedures Order") which, among other things, designated the Chapter 11 Cases as complex chapter 11 cases under D.N.J. LBR 1002-2(a) and prescribed certain service and noticing procedures.

17. On July 23, 2026, the Debtors filed *Debtors' Amended Motion for Entry of (I) an Order (A) Approving Certain Bidding Procedures and the Form and Manner of Notice Thereof,*

[2] *See also, Order Extending Time to File Schedules and Statements and Granting Related Relief* [Docket No. 217].

(B) Authorizing the Debtors to Designate the Stalking Horse Bidder, (C) Scheduling an Auction and a Hearing on the Approval of the Sale of Substantially All of the Debtors' Assets, (D) Authorizing the Debtors to Enter into the Purchase Agreements, (E) Establishing Certain Assumption and Assignment Procedures and Approving the Manner of Notice Thereof, and (F) Granting Related Relief; and (II) an Order (A) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of Encumbrances, (B) Approving the Assumption and Assignment of the Potentially Assigned Contracts, and (C) Granting Related Relief (the "Sale Motion") [Docket No. 30]. The Sale Motion requested approval of the Sale of the Assets pursuant to two purchase agreements with a stalking horse purchaser.

18. On August 17, 2026, the Court entered the *Order (I) Approving Bidding Procedures for the Sale of Substantially All of the Debtors' Assets, (II) Authorizing the Debtors to Designate the Stalking Horse Bidder, (III) Scheduling an Auction and Approving the Form and Manner of Notice Thereof, (IV) Approving Procedures for the Assumption and Assignment of or Rejection of Designated Executory Contracts and Unexpired Leases, (V) Scheduling a Sale Hearing and Approving the Form and Manner of Notice Thereof, and (VI) Granting Related Relief* [Docket No. 138] (the "Bid Procedures Order"), which, among other things, approved the procedures attached thereto as Exhibit "1" (the "Bidding Procedures").

19. Pursuant to the Sale Motion and the Bidding Procedures, the Debtors conducted an auction (the "Auction") on September 10, 2026. Following the Auction and subsequent proceedings before the Court, the Debtors designated Raptor Basin LLC and Mesquite Falcon LLC, each an affiliate of Hut 8 Corp. (collectively, the "Purchasers"), as the winning bidders for the Assets (collectively, the "Purchased Assets").

20. The Court conducted a hearing to consider approval of the Sale Motion on September 29, 2026, which was continued to October 2, 2026. On October 2, 2026, following the continued hearing, the Court entered the *Order (I) Authorizing the Debtors to Enter Into and Perform Under the Raptor Basin LLC and Mesquite Falcon LLC Asset Purchase Agreements, (II) Approving the Sale of the Purchased Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (III) Authorizing the Assumption and Assignment of the Assigned Contracts to Purchasers and Establishing Cure Amounts Related Thereto in Accordance with the Assumption and Assignment Procedures, and (IV) Granting Related Relief* [Docket No. 280] (the "Sale Order"). The Sale Order approved the Sale to the Purchasers pursuant to the applicable asset purchase agreements (collectively, the "APAs").

21. The Debtors are presently working toward closing the Sale Transactions under the APAs and as approved pursuant to the Sale Order.

RELIEF REQUESTED

22. Pursuant to section 1121(d) of the Bankruptcy Code ("Section 1121"), the Debtors request entry of an order: (a) extending the periods during which the Debtors have the exclusive right to (i) file a chapter 11 plan, and (ii) solicit acceptances thereof, in each case, by 120 days, from November 19, 2026 and January 18, 2027, through and including March 19, 2027 and May 18, 2027, respectively, without prejudice to the Debtors' right to request further extensions of the Exclusive Periods in accordance with Section 1121(d); and (b) granting the Debtors such other and further relief as is just.

BASIS FOR RELIEF REQUESTED

23. Section 1121(b) provides for an initial period of 120 days after the commencement of a chapter 11 case during which a debtor has the exclusive right to file a chapter 11 plan. Section 1121(c)(3) provides that if a debtor files a plan within the 120-day Exclusive Filing Period,

it has an exclusive period of 180 days after the commencement of the chapter 11 case to obtain acceptances of such plan. "[T]he point of exclusivity is to promote an environment in which the debtor's business may be rehabilitated and a consensual plan may be negotiated." *Cont'l Casualty Co. v. Burns and Roe Enters., Inc.*, No. 00-41610 (RG), 2005 WL 6289213, at *4 (D.N.J. Nov. 2, 2005).

24. Under Section 1121(d), the Court may extend the Exclusive Periods for cause. In relevant part, Section 1121 provides:

> (1) Subject to paragraph (2), on request of a party in interest made within the respective periods specified in subsections (b) and (c) of this section and after notice and a hearing, the court may for cause reduce or increase the 120-day period or the 180-day period referred to in this section.
>
> (2)(A) The 120-day period specified in paragraph (1) may not be extended beyond a date that is 18 months after the date of the order for relief under this chapter.
>
> (B) The 180-day period specified in paragraph (1) may not be extended beyond a date that is 20 months after the date of the order for relief under this chapter.

11 U.S.C. § 1121(d). The requested 120-day extension is well within these statutory limits.

25. The Bankruptcy Code does not define the term "cause" for purposes of section 1121(d) or establish formal criteria for an extension. The legislative history of Section 1121 indicates, however, that it is intended to be a flexible standard to balance the competing interests of a debtor and its creditors. *See* H.R. Rep. No. 95-595, at 231-32 (1978), *reprinted in* 1978 U.S.C.C.A.N. 5787, 6191; *see also In re Newark Airport/Hotel Ltd. P'ship*, 156 B.R. 444, 451 (Bankr. D.N.J. 1993) (noting that the legislature intended that the granting of an extension be based "on a showing of some promise of probable success [for reorganization]."), *aff'd, FGH Realty Credit Corp. v. Newark Airport/Hotel Ltd. P'ship*, 155 B.R. 93 (D.N.J. 1993); *Cont'l Casualty*, 2005 WL 6289213, at *3 (quoting *In re Sharon Steel Corp.*, 78 B.R. 762, 765 (Bankr. W.D. Pa. 1987)) ("[A] bankruptcy court has 'broad discretion to determine what is sufficient cause in each

individual case.'"). The legislative history underscores this flexibility, explaining that "the bill allows the flexibility for individual cases that is unavailable today." H.R. Rep. No. 95-595, at 231-32 (1978), *reprinted in* 1978 U.S.C.C.A.N. 5787, 6191; *see also Gaines v. Perkins (In re Perkins)*, 71 B.R. 294, 297 (W.D. Tenn. 1987) ("The hallmark of [section 1121(d)] is flexibility."); *In re Amko Plastics, Inc.*, 197 B.R. 74, 77 (Bankr. S.D. Ohio 1996) (noting that Congress intended courts to have flexibility in dealing with extensions of exclusivity); *In re Gibson & Cushman Dredging Corp.*, 101 B.R. 405, 409 (E.D.N.Y. 1989). A debtor should be given a reasonable opportunity to negotiate an acceptable plan with creditors and to prepare adequate financial and nonfinancial information concerning the ramifications of any proposed plan for disclosure to creditors. *See In re Texaco Inc.*, 76 B.R. 322, 327 (Bankr. S.D.N.Y. 1987).

26. Courts within the Third Circuit hold the decision to extend a debtor's exclusivity is left to the sound discretion of the bankruptcy court and should be based on the totality of circumstances. *See Cont'l Casualty*, 2005 WL 6289213, at *3 ("Whether or not to grant an extension of exclusivity 'is a matter of discretion based on all facts and circumstances.'"); *In re Cent. Jersey Airport Servs., LLC*, 282 B.R. 176, 184 (Bankr. D.N.J. 2002) (the "granting or denial of such a request is within the discretion of the bankruptcy court," subject to the moving party's burden of proving that cause exists).

27. Bankruptcy courts commonly examine several factors to determine whether there is "cause" for extension of a debtor's exclusivity centered around whether a debtor has had an adequate opportunity to develop, negotiate, and propose a chapter 11 plan. *See In re Cent. Jersey Airport Servs., LLC*, 282 B.R. 176, 184 (Bankr. D.N.J. 2002); *see also In re Dow Corning Corp.*, 208 B.R. 661, 664-65 (Bankr. E.D. Mich. 1997). These factors include the following:

(i) the size and complexity of the debtor's case;

(ii) the necessity for sufficient time to permit the debtor to negotiate a chapter 11 plan and prepare adequate information;

(iii) the existence of good faith progress towards reorganization;

(iv) the fact that the debtor is paying its bills as they become due;

(v) whether the debtor has demonstrated reasonable prospects for filing a viable plan;

(vi) whether the debtor has made progress in negotiations with its creditors;

(vii) the amount of time which has elapsed in the case;

(viii) whether the debtor is seeking an extension of exclusivity in order to pressure creditors to submit to the debtor's reorganization demands; and

(ix) whether any unresolved contingency exists.

In re Cent. Jersey Airport Servs., 282 B.R. at 184.

28. Not all of these factors are relevant to every case, and courts focus on the relevant subset of the above factors to determine whether cause exists to grant an exclusivity extension in a particular chapter 11 case. *See, e.g.*, *In re Express One Int'l Inc.*, 194 B.R. 98, 100 (Bankr. E.D. Tex. 1996) (identifying a non-exclusive list of factors relevant to determining whether "cause" exists to extend exclusivity); *In re United Press Int'l, Inc.*, 60 B.R. 265, 269 (Bankr. D.D.C. 1986) (finding "cause" to extend exclusivity based on the case's size and complexity and the debtor's diligence); *In re Texaco, Inc.*, 76 B.R. at 326 (holding that size and complexity of the chapter 11 case provided sufficient cause to extend exclusivity).

i. The Debtors' Cases are Complex.

29. Both Congress and courts have recognized that the size and complexity of a debtor's case alone may constitute cause for extension of a debtor's exclusive periods to file a plan and solicit acceptances of such a plan. H.R. Rep. No. 95-595, at 231-232, 406 (1978), *reprinted in* 1978 U.S.C.C.A.N. 5787, 6191 ("[I]f an unusually large company were to seek reorganization under chapter 11, the court would probably need to extend the time in order to allow the debtor to

reach an agreement."); *see Cont'l Casualty*, 2005 WL 6289213, at *3 (quoting *Texaco*, 76 B.R. at 326) ("The large size of the debtor and the consequent difficulty in formulating a plan of reorganization for a huge debtor with a complex financial structure are important factors which generally constitute cause for extending the exclusivity periods.").

30. The Chapter 11 Cases involve multiple Debtors, cross-border issues and thousands of creditors. As the Court is aware, the nature of the Assets and Sale present complicated factual and related legal issues which add to the complexity of the Chapter 11 Cases. Further, the creditor body in this case is atypical given that the vast majority of the creditors are located in China and certain alleged claims involve complicated crypto concepts and legal matters.

ii. The Debtors Have Demonstrated a Necessity for Additional Time to Negotiate a Chapter 11 Plan and Prepare Adequate Information.

31. Section 1121 is designed to provide debtors with the time and flexibility needed to negotiate with stakeholders and develop a confirmable plan. Consistent with that purpose, the Debtors are now engaging with key constituencies on the terms necessary for a value-maximizing chapter 11 plan. The Debtors have made substantial, good-faith progress toward that goal as aforesaid but require additional time given the complexities of the Chapter 11 Cases and anticipated lengthy negotiations with the Committee and other parties in interest.

32. As the bar date has not yet passed, the Debtors cannot fully assess the claims pool. Additional time will be required to formulate and negotiate a plan which addresses various types and amounts of claims.

33. The exclusivity extension is necessary to ensure that the plan maximizes value for creditors and the Estates, particularly as the Debtors work to close the Sale Transactions approved under the Sale Order. This factor weighs strongly in favor of extending the Exclusive Periods.

iii. The Debtors Have Made Good Faith Progress Towards a Plan.

34. Since the Petition Date, the Debtors have expended significant time and effort working in good faith with all parties in interest to preserve value of the Estates.

35. Because the foregoing matters required substantial work and demanded the full attention of the Debtors and their employees and professionals, the Debtors believe they are now better postured to turn their attention toward the remaining tasks in these Chapter 11 Cases—principally formulating, negotiating, and confirming a chapter 11 plan that will distribute the proceeds of the Sale Transactions in a fair, efficient, and orderly manner for the benefit of creditors. Thus, this factor supports the extension of the Exclusive Periods. *See In re Adelphia Commc'ns Corp.*, 352 B.R. 578, 588 (Bankr. S.D.N.Y. 2006) (Bankr. S.D.N.Y. 2006) (describing the good faith progress factor as "one of the more important factors" under the facts of these Chapter 11 Cases).

iv. The Debtors are Paying Their Postpetition Bills as They Become Due.

36. Since the commencement of these Chapter 11 Cases, the Debtors have remained current on their post-petition obligations and administrative costs.

37. An extension of the Exclusive Periods will directly benefit the Estates and their stakeholders by allowing the Debtors to continue orderly administration of the estates, preserve creditor confidence, and facilitate the cooperative engagement of key constituencies in connection with the chapter 11 process. For these reasons, this factor strongly supports the relief requested.

v. The Debtors Have Demonstrated Reasonable Prospects for Filing a Viable Plan.

38. The Debtors have accomplished the most significant value-driven tasks in these Chapter 11 Cases by obtaining approval of the Sale and working toward closing the Sale Transactions. The Sale is expected to generate meaningful proceeds to fund administration and distributions under a plan.

39. Moreover, the Debtors have worked cooperatively with the Committee and other stakeholders throughout these proceedings. Given the positive progress to date and the ongoing dialogue with creditors, the Debtors believe they will be in a position to propose, negotiate and file a viable plan within a reasonable timeframe. Accordingly, this factor weighs strongly in favor of extending exclusivity.

vi. The Debtors Have Made Progress in Negotiations with Their Creditors.

40. Since the commencement of the Chapter 11 Cases, the Debtors have maintained regular and transparent communication with their creditors, including ongoing, constructive engagement with the Committee. The Debtors worked well with the Committee on the Sale. The Debtors intend to continue this collaborative process as much as possible to hopefully reach a consensual plan with the creditors. This coordinated approach enhances the likelihood of a timely and orderly confirmation process. For these reasons, this factor supports the requested extension of the Exclusive Periods.

vii. Only a Small Amount of Time Has Elapsed Since the Petition Date.

41. This is the Debtors' first request for an extension of the Exclusive Periods, and only approximately four months have passed since the Petition Date. The Debtors have achieved significant results during this short time in progressing toward their chapter 11 exit as aforesaid.

42. In light of the Debtors' "track record" to date, the Debtors submit that current request for additional time is warranted. Accordingly, this factor strongly supports the requested relief.

viii. The Debtors are Seeking an Extension of Exclusivity to Better Position Their Estates for Plan Confirmation, Not to Pressure Creditors to Submit to Their Reorganization Demands.

43. The Debtors' request to extend the Exclusive Periods is driven solely by the need to maximize value for the Estates and their stakeholders, not by any intent to coerce or pressure

creditors into accepting the Debtors' proposed plan. Specifically, the formulation and design of the Debtors' plan is dependent on events yet to occur and that have only recently occurred, such as Sale approval and closing. Accordingly, the extension is necessary to allow the Debtors to finalize a comprehensive and equitable chapter 11 plan, incorporating input from the Committee and other key stakeholders, and to ensure that all distributions reflect the full value realized from the Sale Transactions. Because the requested extension is grounded in legitimate objectives rather than any tactical leverage over creditors, this factor strongly supports granting the relief sought.

ix. Additional Factors Exist to Support an Extension of the Debtors' Exclusive Periods.

44. In addition to the factors discussed above, terminating the Exclusive Periods at this stage would significantly disrupt the administration of these Chapter 11 Cases. Primarily, such a scenario could impact closing of the Sales, create confusion and competing plans, complicate the orderly administration of the estates, delay the resolution of these Chapter 11 Cases, and undermine the Debtors' ability to implement a value-maximizing plan. Denying the requested relief could frustrate the objectives of Chapter 11 Cases, impede recoveries, increase administrative burden and costs, and materially diminish the value available to the Debtors' stakeholders.

45. For all of the foregoing reasons, the Debtors submit that "cause" exists under Section 1121(d) to extend the Exclusive Periods. Accordingly, the Debtors respectfully request that the Court grant the requested relief.

WAIVER OF MEMORANDUM OF LAW

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

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

NOTICE

48. 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) counsel to the Committee; and (iii) all parties requesting notice pursuant to Bankruptcy Rule 2002. The Debtors submit that such notice is sufficient, and no other or further notice need be provided.

CONCLUSION

WHEREFORE, the Debtors respectfully request entry of the Proposed Order: (i) granting the relief requested herein; and (ii) granting the Debtors such other and further relief as the Court deems just and proper.

Dated: October 30, 2026

ARCHER & GREINER, P.C.

/s/ Stephen M. Packman

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EXHIBIT A

(Proposed Order)

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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

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Attorneys for Debtors

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

ORDER, PURSUANT TO SECTION 1121(d) OF THE BANKRUPTCY CODE, EXTENDING THE EXCLUSIVE PERIODS WITHIN WHICH THE DEBTORS MAY FILE A CHAPTER 11 PLAN AND SOLICIT ACCEPTANCES THEREOF AND GRANTING RELATED RELIEF

The relief set forth on the following pages, numbered two (2) through four (4), 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 #16884116, Lawrence, NJ 08648.

Debtors: Poolin Technology Pte. Ltd., *et al.*
Case No. 26-18325 (EJO)
Caption of Order: Order, Pursuant to Section 1121(d) of the Bankruptcy Code, Extending the Exclusive Periods Within Which the Debtors May File a Chapter 11 Plan and Solicit Acceptances Thereof and Granting Related Relief

Upon consideration of the motion (the "Motion")[1] filed on behalf of the above-captioned debtors and debtors-in-possession (collectively, the "Debtors") for entry of an order (this "Order"), pursuant to section 1121(d) of title 11 of the United States Code (the "Bankruptcy Code") and rule 9006(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), (a) extending the periods during which the Debtors have the exclusive right to (i) file a chapter 11 plan (the "Exclusive Filing Period") and (ii) solicit acceptances thereof (the "Exclusive Solicitation Period," and together with the Exclusive Filing Period, the "Exclusive Periods"), in each case by 120 days, and (b) granting the Debtors such other and further relief as is just, each 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 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.); and 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 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 meanings ascribed to such terms in the Motion.

2. The Exclusive Filing Period is extended by 120 days, from November 19, 2026, through and including March 19, 2027.

3. The Exclusive Solicitation Period is extended by 120 days, from January 18, 2027, through and including May 18, 2027.

4. The extensions granted herein are without prejudice to the right of the Debtors to seek further extensions of the Exclusive Periods in accordance with section 1121(d) of the Bankruptcy Code, or to seek any other appropriate relief, and without prejudice to the right of any party in interest to seek to reduce the Exclusive Periods for cause.

5. Nothing in this Order, and no action taken pursuant hereto, shall (a) constitute an assumption, assignment, or rejection of any agreement pursuant to section 365 of the Bankruptcy Code; (b) constitute an admission as to the validity, priority, or amount of any claim against the Debtors or their estates; (c) impair, prejudice, waive, or otherwise affect the rights of the Debtors or their estates to contest the validity, priority, or amount of any claim, or to assert any claim or cause of action against any party; or (d) be construed as a promise to pay any claim. The Debtors expressly reserve all of their rights with respect to the foregoing.

6. The Debtors are authorized to take all actions necessary or appropriate to implement and effectuate the relief granted in this Order.

7. The requirement under D.N.J. LBR 9013-1(a)(3) that the Motion be accompanied by a separate memorandum of law is deemed satisfied by the contents of the Motion or otherwise waived.

8. Notice of the Motion as provided therein is good and sufficient under the circumstances, satisfies the requirements of the Bankruptcy Rules and the Local Rules, and no other or further notice of the Motion or the relief granted herein is required.

9. Notwithstanding any applicable Bankruptcy Rule to the contrary, the terms and conditions of this Order are immediately effective and enforceable upon its entry.

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