Docket #0329 Date Filed: 11/04/2026

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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

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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 ENTRY OF AN ORDER AUTHORIZING USE OF FUNDS HELD IN ESCROW BY ARCHER & GREINER, P.C. TO PAY PROFESSIONAL COMPENSATION AND EXPENSES IN ACCORDANCE WITH THE FEE ORDER AND GRANTING RELATED RELIEF

PLEASE TAKE NOTICE that a hearing on the *Debtors' Motion for Entry of an Order Authorizing Use of Funds Held in Escrow by Archer & Greiner, P.C. to Pay Professional Compensation and Expenses in Accordance with the Fee Order and Granting Related Relief* (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.

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"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 (bsandler@pszjlaw.com), Robert J. Feinstein, Esquire (rfeinstein@pszjlaw.com),

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

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: November 4, 2026

ARCHER & GREINER, P.C.

/s/ Stephen M. Packman

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DISTRICT OF NEW JERSEY

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In re:

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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
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DEBTORS' MOTION FOR ENTRY OF AN ORDER AUTHORIZING USE OF FUNDS HELD IN ESCROW BY ARCHER & GREINER, P.C. TO PAY PROFESSIONAL COMPENSATION AND EXPENSES IN ACCORDANCE WITH THE FEE ORDER 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 "Debtors"), by and through their undersigned counsel, hereby respectfully move (this "Motion")

[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.

for entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), authorizing use of funds held in escrow by Archer & Greiner, P.C. ("Archer") to pay compensation and reimbursement of expenses to Court-retained professionals, strictly in accordance with the Administrative Fee Order entered August 17, 2026 [Docket No. 139] (the "Fee Order"). In support of the Motion, the Debtors respectfully state as follows:

PRELIMINARY STATEMENT

1. The Debtors seek authority to use cash available to their estates ("Estates") to pay professional fees and expenses payable under the Fee Order. The monthly compensation and expenses which are anticipated to become eligible for payment in the coming months under that Order will exceed the Debtors' presently available cash. Access to the Escrow Funds (as defined below) will enable the Debtors to meet those obligations as they become payable and maintain the professional services necessary to administer these Chapter 11 Cases (as defined below).

2. As noted on the record at the first day hearing, Archer currently holds $1,515,968.63 in escrow (the "Escrow Funds") from Poolin. The Escrow Funds consist of proceeds from the conversion to U.S. dollars of Bitcoin and other cryptocurrency assets of Poolin, including cryptocurrency previously held as collateral and subsequently returned to Poolin and cryptocurrency remaining in Poolin wallets. The Debtors believe that the Escrow Funds are unencumbered and available to fund professional fees as permitted by the Fee Order.

3. As such, the Debtors seek authority to use the Escrow Funds for payment of professional fees and expenses as set forth herein. The proposed use of the Escrow Funds follows the Debtors' sound business judgment and is thus authorized under section 363(b) of the Bankruptcy Code.

JURISDICTION AND VENUE

4. 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.

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

6. The statutory predicates for the relief requested herein are sections 105, 330, 331, and 363 of title 11 of the United States Code (the "Bankruptcy Code"). The Debtors submit that the relief concerns administration of the Estates and implementation of the Fee Order under 28 U.S.C. § 157(b)(2)(A) and (B).

FACTUAL AND PROCEDURAL BACKGROUND

7. 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").

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

9. On August 12, 2026, the Office of the United States Trustee for the District of New Jersey (the "U.S. Trustee") appointed the Official Committee of Unsecured Creditors (the

"Committee"). *See Notice of Appointment of Official Committee of Unsecured Creditors* [Docket No. 112].

10. 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.

11. On July 23, 2026, the Debtors filed the *Debtors' Motion for Entry of an Administrative Fee Order (I) Establishing Procedures for the Allowance and Payment of Interim Compensation and Reimbursement of Expenses of Professionals Retained by Order of this Court, and (II) Granting Related Relief* (the "Compensation Procedures Motion") [Docket No. 25].

12. On August 17, 2026, the Court entered the Fee Order [Docket No. 139], granting the relief requested in the Compensation Procedures Motion, including, not limited to, establishing monthly compensation procedures for professionals retained under sections 327, 328(a), and 1103, as applicable. Fee Order ¶ 2(A)–(D).

13. Under paragraph 2(C)(1) of the Fee Order, following the objection deadline and filing and service of the required certification, an eligible professional may receive 80% of fees and 100% of expenses not subject to objection, provided that retention has been approved. The remaining 20% of fees may be sought in an interim or final application. Objected-to amounts remain withheld or are resolved under the procedures specified in the Fee Order. Additionally, the Fee Order requires periodic interim applications, disclosure of payments on monthly operating reports, and preservation of parties' rights to object at the interim and final fee stages. Fee Order ¶¶ 2(D), 3, 7. Payments remain subject to disgorgement until final allowance. Fee Order ¶ 7.

14. The Debtors are current on their post-petition expenses, including statutory fees due and owing to the U.S. Trustee. However, the monthly professional fees and expenses which the Debtors expect to become due and payable over the ensuing months under the Fee Order will likely exceed currently available cash. The Escrow Funds provide an existing source of liquidity to pay these obligations.

RELIEF REQUESTED

15. The Debtors request authority to direct Archer, as holder of the Escrow Funds, to disburse the Escrow Funds to LSD's Debtor in Possession account with Flagstar Bank ("DIP Account") so that the Debtors can pay professional compensation and expenses eligible for payment under the Fee Order or as otherwise authorized by a subsequent order of this Court. Disbursements will follow the Fee Order's established monthly procedures, including its applicable payment percentages, objection process, and requirements for interim and final fee allowance.

16. Upon Archer's disbursement of the Escrow Funds of Poolin to the DIP Account, the Debtors shall internally book a corresponding inter-company account entry.

17. The Debtors will maintain records of all disbursements and report professional payments in their monthly operating reports as required by the Fee Order.

18. Nothing in this Motion is meant to supersede or derogate the compensation procedures that are set forth in the Fee Order.

BASIS FOR RELIEF

19. Sections 330 and 331 of the Bankruptcy Code govern allowance of compensation and reimbursement of expenses to retained professionals, and the Fee Order implements those provisions through monthly payment procedures. The Debtors seek to use the Escrow Funds to make payments in the amounts and at the times permitted under that existing framework. The

requested order does not enlarge any professional's entitlement to compensation or dispense with this Court's review.

20. Further, section 363(b)(1) of the Bankruptcy Code authorizes a debtor in possession, after notice and a hearing, to use property of the estate outside the ordinary course of business when supported by sound business judgment.

21. The Debtors submit that use of the Escrow Funds meets that standard. The Escrow Funds are an available source of cash, the Debtors believe they are unencumbered, and the payment of professional services is essential to the continued administration of these Chapter 11 Cases. Because the contemplated miscellaneous asset sales have not yet closed, the Debtors cannot presently rely on such proceeds to meet monthly professional obligations.

22. Moreover, section 105(a) further authorizes the Court to enter orders necessary or appropriate to carry out the provisions of the Bankruptcy Code. The requested relief implements the compensation framework already approved by the Court and enables the Debtors to satisfy the monthly professional obligations arising under that framework. Authorizing use of the Escrow Funds will promote orderly case administration without requiring any modification of the Fee Order's substantive payment procedures.

WAIVER OF MEMORANDUM OF LAW

23. 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

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

NOTICE

25. 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: November 4, 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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Debtors.

Chapter 11

Case No. 26-18325 (EJO)

(Jointly Administered)

Judge: Eamonn J. O'Hagan

ORDER AUTHORIZING USE OF ESCROW FUNDS TO PAY PROFESSIONAL COMPENSATION AND EXPENSES IN ACCORDANCE WITH THE FEE ORDER 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 Authorizing Use Of Escrow Funds To Pay Professional Compensation And Expenses In Accordance With The Fee Order 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"), authorizing Debtors' use of certain funds held in escrow by Archer & Greiner, P.C. ("Archer") to pay compensation and reimbursement of expenses to Court-retained professionals, in accordance with the Fee Order entered August 17, 2026 [Docket 139]; 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.

2. Pursuant to sections 105(a) and 363(b) of the Bankruptcy Code, the Debtors are authorized, but not directed, to use up to $1,515,968.63 in cash currently held in escrow by Archer (the "Escrow Funds") to pay compensation and reimbursement of expenses to retained professionals under order of this Court, in amounts and at times authorized for payment under the

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

Fee Order or another applicable order of this Court. This Order authorizes a source of payment only; it does not itself allow any fee or expense.

3. No payment may be made unless (a) the recipient's retention has been approved by Court order; (b) the amount is presently eligible for payment under paragraph 2(C) of the Fee Order or a separate Court order; (c) any required objection period has expired and the required certification has been filed and served, or the payment is otherwise expressly authorized; and (d) any applicable holdback or unresolved objection has been honored.

4. Archer is authorized and directed, upon entry hereof and receipt of written disbursement instructions from the Debtors, to transfer the Escrow Funds to the Debtor in Possession Account ("DIP Account") of Debtor, Lonestar Dream Inc. The Escrow Funds shall be held in the DIP Account under the supervision of the Debtors' CRO (who shall have sole authority to authorize disbursements therefrom) and shall be used by the Debtors solely for payment of professional fees as permitted by the Fee Order and this Order, absent further order of the Court.

5. Payments made under this Order shall comply with the Fee Order, including paragraph 2(C)(1) of the Fee Order, which permits payment of 80% of fees and 100% of expenses not subject to objections after expiration of the objection deadline and filing and service of the required certification. Payment of any remaining fee holdback may be paid from the Escrow Funds only after allowance and payment authorization through the applicable interim or final fee process or another express order of this Court.

6. The Debtors shall account (via an inter-company book entry) for the transfer of the Escrow Funds of Poolin to the DIP Account of Lonestar Dream and shall report all payments

therefrom to professionals (or otherwise permitted) in their monthly operating reports in accordance with paragraph 3 of the Fee Order.

7. The Debtors and Archer are authorized to take actions necessary to implement this Order, consistent with its terms.

8. The Court retains jurisdiction to interpret and enforce this Order.