IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: RELIZ TECHNOLOGY GROUP HOLDINGS INC., *et al.*, Debtors.[1]	Chapter 11 Case No. 26-10371 (TMH) (Jointly Administered) **Objection Deadline: May 5, 2026 at 4:00 p.m. (ET)** **Hearing Date: May 12, 2026 at 2:00 p.m. (ET)**

THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION FOR AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 AND LOCAL BANKRUPTCY RULE 2004-1 DIRECTING THE EXAMINATION AND PRODUCTION OF DOCUMENTS

The Official Committee of Unsecured Creditors (the "Committee") of the above-captioned debtors and debtors in possession (the "Debtors"), by and through its undersigned proposed counsel, hereby respectfully moves (the "Motion"), pursuant to section 105(a) and 1103(c) of title 11 of the United States Code (the "Bankruptcy Code"), rule 2004 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and rule 2004-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), for the entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order") authorizing the Committee to conduct examinations of: (i) Nicholas Hammer; Gordon Wallace; Brian King; Gabriella Kusz, Head of Strategy; Neil Van Hurs; Amy Shelly; Joseph Perry; and other current and former directors and officers of the Debtors (the "D&Os"); (ii) John Divine; Ray Nasser; and other former employees of the Debtors (the "Debtors' Former Employees"); (iii) Celsius Network Ltd. ("Celsius"); Maple Finance; CME Ventures; Rosemoor; Babel Finance; Clark Sharp & Reynolds; Nexo Capital Inc.; AEXA Digital Infrastructure; and other current and former

[1] The Debtors in these chapter 11 cases, along with the last four digits of their respective federal tax identification numbers, are: Reliz Technology Group Holdings Inc. (6265); Reliz Technologies LLC (1968); Reliz LTD (N/A); and Reliz CI LTD (N/A). The Debtors' service address is 401 West Ontario St., Suite 400, Chicago, IL 60654.

prepetition lenders and investors of the Debtors (the "Prepetition Lenders"; and together with the D&Os and Debtors' Former Employees, the "Relevant Parties"), and permitting the Committee to issue requests substantially in the form attached hereto as **Exhibit B**, for the production of documents and communications within the respective party's possession, custody, or control and the provision of testimony in a manner consistent with the Proposed Order that are responsive to the categories and topics set forth in therein (the "Subpoenas" or "Requests").

In support of this Motion, the Committee respectfully states as follows:

PRELIMINARY STATEMENT

1. Since its formation, the Committee has been charged with answering a fundamental question at the heart of these cases: how did a roughly $100 million shortfall arise in BlockFills' books and records such that customer accounts cannot be returned in full, whether in crypto, cash, or otherwise? In furtherance of that mandate, the Committee has undertaken both formal and informal efforts to gather information, including outreach to creditors and other parties in interest and multiple meet-and-confers with the Debtors' special committee counsel regarding potential informal interviews of current and former directors and officers.

2. Through those discussions, it became clear that the Committee will not be permitted to participate in any such informal interviews without jeopardizing the assertion and preservation of applicable privileges. That limitation effectively forecloses a cooperative, informal path for the Committee to obtain critical information necessary to fulfill its duties.

3. Furthermore, the Committee reached out to counsel for the Debtors regarding informal processes for interviews and discovery. Because the majority of the recipients are related to the Debtors, the Committee sought the Debtors' consent to this Motion, in hopes of submitting the Motion on an uncontested basis. The Debtors have taken the position that because they do not

represent each of the Relevant Parties individually, the Debtors' refuse to provide such consent. Additionally, despite the Committee's efforts to meet with some of the individuals listed herein, it has been unable to discuss this Motion with all of the Relevant Parties. As a result, the Committee must now avail itself of the tools provided under the Bankruptcy Code and proceed under Rule 2004 to obtain documents and testimony from relevant parties.

4. The Committee's investigation is not limited to understanding the causes of the shortfall. It also necessarily encompasses whether the Debtors' current or former directors and officers, or other parties in interest, may bear civil liability or potential criminal exposure arising from the conduct at issue. These issues are particularly urgent in light of the plan currently on file, which contemplates releases and is scheduled to be heard in the coming months. The Committee cannot meaningfully evaluate or take a position on those proposed releases without first developing a sufficient factual record.

5. Accordingly, the Committee must act now, and act expeditiously, to conduct the discovery necessary to carry out its statutory obligations. While the Committee does not yet have definitive answers, it believes that the discovery sought through this Motion will allow it to meaningfully assess the relevant conduct and advocate on behalf of the estate and its constituents. The requests and topics included in the Subpoenas are intentionally broad to capture information that the Committee requires to conduct its investigation. For these reasons, the Committee respectfully requests that the Court grant this Motion and permit the Committee to proceed with its investigation without further delay.

JURISDICTION AND VENUE

6. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

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

8. The statutory and legal predicates for the relief requested herein are 11 U.S.C. § 1103, Rule 2004 and 9016, Local Rule 2004-1.

9. The Committee consents to the entry of a final order in connection with this Motion in accordance with Local Rule 9013-1(f) if it is determined that the Court, absent the consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

BACKGROUND

A. General Background

10. On March 12, 2026, the Debtors created a special committee (the "Special Committee"), comprised of disinterested director Matthew Kahn. Among other things, the Special Committee is charged with managing any potential conflict matters, including investigating, releasing, or settling certain potential claims or causes of action of BlockFills, if any.

11. On March 15, 2026, (the "Petition Date"), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code (collectively, the "Chapter 11 Cases"). The Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b), in the United States Bankruptcy Court for the District of Delaware (the "Court"). The Debtors continue to manage their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in these chapter 11 cases.

12. On March 27, 2026, the United States Trustee for the District of Delaware (the "United States Trustee") filed its *Notice of Appointment of Committee of Unsecured Creditors* [D.I. 104] pursuant to section 1102(a)(1) of the Bankruptcy Code.

13. On March 30, 2026, the Committee selected Morris James LLP as its counsel and commenced an investigation into assets of the estate that could provide recoveries for general unsecured creditors. On April 1, 2026, the Committee selected FTI Consulting, Inc. as its proposed financial advisor.

14. On April 2, 2026, the Committee issued its initial requests for information on an informal basis. To date, the Committee has not received a substantial production of documents, notwithstanding the Debtors agreeing to produce documents responsive to those requests on a rolling basis.

B. Factual Background and Need for Investigation

15. BlockFills was founded in 2017 and raised approximately $43 million in equity through a Pre-Series A and Series A round. D.I. 3 (the "First Day Declaration") ¶¶ 16–17. The Debtors operated a multi-faceted cryptocurrency platform offering trading, lending, and liquidity services supported by proprietary technology and relationships with liquidity providers. *Id.* ¶¶ 18–29.

16. From 2022 through 2025, the Debtors suffered significant losses tied to lending relationships. The Debtors loaned digital assets to Babel Finance, resulting in approximately $8.5 million in unrecoverable exposure following its bankruptcy. *Id.* ¶ 44. A separate 50 BTC loan to Clark Sharp & Reynolds (Coinsource) defaulted and remains unsatisfied despite a judgment. *Id*. ¶ 45.

17. The Debtors also entered into a financing arrangement with Nexo Capital Inc. in connection with a loan to AEXA Digital Infrastructure, which ultimately defaulted. *Id*. ¶¶ 46–47. The resulting dispute required the Debtors to pay approximately $12 million to Nexo, further impairing liquidity. *Id*. ¶ 48.

18. Separately, a lending dispute with Celsius resulted in arbitration and promissory notes exceeding $16 million in original principal, with approximately $4.8 million outstanding as of the petition date. *Id.* ¶¶ 49–54. In total, the Debtors reported approximately $145 million in unsecured debt. *Id.* ¶ 38.

19. At the same time, the Debtors engaged in the routine commingling of customer and corporate funds, using customer assets to fund operations and obligations. *See* First Day Hr'g Tr., 54:4–22 (D. Del. Bankr. Mar. 17, 2026); D.I. 10 ¶ 14.

20. These practices, combined with failed lending relationships and significant outflows, contributed to a substantial shortfall in the Debtors' financial position—effectively a massive balance sheet deficiency approaching $100 million when accounting for unrecovered loan assets and customer obligations. *Id.* ¶ 38.

21. In light of these issues, the Committee is investigating the Debtors' prepetition conduct, including the use and transfer of customer assets, lending practices, and the causes of the Debtors' liquidity collapse. The Committee has engaged FTI Consulting to trace digital assets on the blockchain and reconstruct cash flows to identify the movement of funds and potential recoveries.

22. The Committee has attempted to obtain this information informally to conserve estate resources. However, those efforts have reached an impasse. The Debtors' Special Committee and its counsel have asserted privilege over their investigation and declined to provide meaningful access to underlying information. As a result, the Committee is forced to conduct its investigation through formal discovery pursuant to Rule 2004, including the need to obtain discovery from and conduct examinations of the Debtors' former and current directors and officers, former employees, and current and former lenders and investors.

REQUESTED RELIEF

23. To enable the Committee to conduct a thorough and complete investigation in this action, the Committee requests entry of an order, substantially in the form attached hereto as **Exhibit A**, directing the Relevant Parties to produce the documents requested in the respective Requests For Production on a rolling basis, but in any event within seven (7) days of entry of an order granting this Motion, and to appear for an examination within seven (7) days of entry of the same.

BASIS FOR RELIEF

24. Under Bankruptcy Code section 105(a), the Court maintains broad equitable powers to fashion an order or decree in aid of the enhancement of the value of the Debtors' estates for the benefit of all stakeholders. 11 U.S.C. § 105(a). Bankruptcy Rule 2004(a) provides that "[o]n a party in interest's motion, the court may order the examination of any entity." Fed. R. Bankr. P. 2004(a).

25. Discovery under Bankruptcy Rule 2004 includes within its scope any matter that may relate to the property and assets of the estate; the financial condition of the debtor; and any matter that may affect the administration of a debtor's estate. *See* Fed. R. Bankr. P. 2004(b); *see also In re Teleglobe Commc'ns Corp.*, 493 F.3d 345, 354 n.6 (3d Cir. 2007) ("Federal Rule of Bankruptcy 2004 allows parties with an interest in the bankruptcy estate to conduct discovery into matters affecting the estate."); *Official Comm. of Unsecured Creditors of Cybergenics Corp. v. Chinery*, 330 F.3d 548, 564–65 (3d Cir. 2003) ("[A] creditors' committee may certainly assist a debtor in locating property under Bankruptcy Rule 2004 . . . ."); *In re Wash. Mut., Inc.*, 408 B.R. 45, 50 (Bankr. D. Del. 2010) ("The purpose of the examination is to enable the trustee to discover the nature and extent of the bankruptcy estate.").

26. Bankruptcy Rule 2004 "affords both debtors and creditors the broad rights of examination of a debtor's or third-party's records." *See Snyder v. Soc'y Bank*, 181 B.R. 40, 41 (S.D. Tex. 1994) (citing *Cameron v. United States*, 231 U.S. 710, 716 (1914)); *see also In re E. W. Resort Dev. V, L.P., L.L.L.P.*, 10-10452 (BLS), 2014 WL 4537500, at *7 (Bankr. D. Del. Sept. 12, 2014) ("Rule 2004 examinations are often used to discover assets, and courts have recognized that the scope of a 2004 examination is 'unfettered and broad' and the examination is in the nature of a 'fishing expedition.'"). Bankruptcy Rule 2004 permits broad discovery because "[t]he purpose of a Rule 2004 examination is to assist a party in interest in determining the nature and extent of the bankruptcy estate, revealing assets, examining transactions and assessing whether wrongdoing has occurred." *In re Recoton Corp.*, 307 B.R. 751, 755 (Bankr. S.D.N.Y. 2004).

27. This broad scope extends to any third parties who have a relationship with the debtors and includes the designation of an informed person to appear for an oral examination. *See In re Ionosphere Clubs, Inc.*, 156 B.R. 414, 432 (S.D.N.Y. 1993), *aff'd*, 17 F.3d 600 (2d Cir. 1994) ("Because the purpose of the Rule 2004 investigation is to aid in the discovery of assets, any third party who can be shown to have a relationship with the debtor can be made subject to a Rule 2004 investigation."); *In re Wilcher*, 56 B.R. 428, 433 (Bankr. N.D. Ill. 1985) (Rule 2004 examination "may extend to creditors and third parties who have had dealings with the debtor.") (citations omitted); *In re Analytical Sys., Inc.*, 71 B.R. 408, 412 (Bankr. N.D. Ga. 1987) ("The application of the discovery device of Bankruptcy Rule 7030 (Fed. R. Civ. P. 30), for a corporation to designate and inform persons to testify on its behalf to Bankruptcy Rule 2004 examinations is both consistent with and assists in the accomplishment of expeditious administration."); *see also In re Mittco, Inc.*, 44 B.R. 35, 36 (Bankr. D. Wis. 1984) ("Where there is a showing that the purpose of the examination is to enable a party to probe into matters which may lead to the discovery of assets

by examining not only the debtor, but also other witnesses, such inquiry is allowed."). Accordingly, bankruptcy courts routinely require third parties to produce documentary and testimonial discovery pursuant to Rule 2004. *See, e.g., Millennium*, 562 B.R. 614, 628 (D. Del. Bank. 2016). In *Millennium*, the court granted a Rule 2004 examination of third parties to determine "the scope of viable claims that may exist on behalf of the Plan trusts against potential third parties that may be culpable for causing such harm to the Debtors." *Id*. at 627.

28. As a fiduciary for all unsecured creditors, the Committee is granted broad statutory powers to, among other things, "investigate the acts, conduct, assets and liabilities and financial condition of the debtor, . . . and any other mater relevant to the case or to the formulation of a plan." 11 U.S.C. §1103(c)(2). Each request and topic in the Requests seeks information concerning the acts, conduct, property, liabilities, and/or financial condition of the Debtor, or matters affecting the administration of the Debtor's estate.

29. Specifically, the Requests seek, among other things, information on the commingling of customer assets, the actions of former and current directors and officers, events leading to the Debtors' filing for bankruptcy, and potential causes of action.

30. Discovery is warranted to allow the Committee to investigate the events before and leading up to the Debtors' bankruptcy.

31. In sum, the information sought through the Requests falls squarely within the permissible scope of discovery under Bankruptcy Rule 2004. Accordingly, relief requested herein should be granted to permit the Committee to adequately investigate claims against the Debtors' estate and prevent dissipation of assets.

CERTIFICATION PURSUANT TO LOCAL RULE 2004-1

32. The Committee met and conferred with counsel for the Special Committee on multiple occasions. During those discussions, the Committee and the Special Committee discussed the possibility of coordinating joint fact discovery in these Chapter 11 Cases. Ultimately however, the parties' interests diverged, and Special Committee counsel declined to permit the Committee to communicate with former and current directors and officers of the Debtors. As a result, the Committee is compelled to file this Motion to obtain the information necessary for it to meaningfully investigate the potential claims and events referenced herein.

33. Pursuant to Local Rule 2004-1(b), the Committee's undersigned counsel certifies that the Committee conferred with counsel for the Debtors regarding the requested production of documents and the timing of such production.

34. This Motion is filed to ensure that the Relevant Parties are compelled to make complete productions of documents responsive to the Committee's requests and enable the Committee to perform an appropriate investigation in the exercise of its fiduciary duties in the expedited timeframe required by these cases.

35. Under these circumstances, the matters requested in this Motion are appropriate and within the scope of Bankruptcy Rule 2004.

RESERVATION OF RIGHTS

36. The Committee reserves its right to amend, modify, and/or supplement this Motion and the Subpoenas at any time. Notwithstanding anything contained in this Motion, nothing herein shall be construed as a waiver of any rights of the Committee.

37. The Committee reserves all rights to request, pursuant to Bankruptcy Rule 2004 or otherwise, additional documents or examination upon review of the documents produced in connection with this Motion or otherwise.

NOTICE

38. Notice of this Motion will be provided to: (i) counsel to the Debtors; (ii) counsel, if any, for each of to the Relevant Parties; (iii) the office of the United States Trustee for the District of Delaware; (iv) counsel for the Special Committee; and (v) any party requesting notice under Bankruptcy Rule 2002. The Committee submits that no other or further notice is required.

CONCLUSION

WHEREFORE, the Committee respectfully requests that the Court grant the Motion and enter the Proposed Order attached hereto as **Exhibit A** and grant the Committee such further relief as is just and appropriate.

Dated: April 24, 2026

MORRIS JAMES LLP

/s/ Samantha L. Rodriguez

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Proposed Counsel to the Official Committee of Unsecured Creditors

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
RELIZ TECHNOLOGY GROUP HOLDINGS INC., *et al.*,	Case No. 26-10371 (TMH)
	(Jointly Administered)
Debtors.[1]	**Objection Deadline: May 5, 2026 at 4:00 p.m. (ET)** **Hearing Date: May 12, 2026 at 2:00 p.m. (ET)**

NOTICE OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION FOR AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 AND LOCAL BANKRUPTCY RULE 2004-1 DIRECTING THE EXAMINATION AND PRODUCTION OF DOCUMENTS

PLEASE TAKE NOTICE that on April 24, 2026, the Official Committee of Unsecured Creditors (the "Committee"), by and through their proposed undersigned counsel, filed *The Official Committee of Unsecured Creditors' Motion for an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004-1 Directing the Examination and Production of Documents* (the "2004 Motion") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that responses, if any, to the 2004 Motion must be in writing, in conformity with the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court for the District of Delaware, filed with the Bankruptcy Court and served upon the undersigned counsel so as to be received on or before **May 5, 2026 at 4:00 p.m. (ET) (the "Objection Deadline").** At the same time, you must also serve a copy of the response upon undersigned proposed counsel.

PLEASE TAKE FURTHER NOTICE THAT a hearing on the 2004 Motion is scheduled for **May 12, 2026 at 2:00 p.m. prevailing Eastern Time** before the Honorable Thomas M. Horan, United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom 5, Wilmington, Delaware 19801.

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

[1] The Debtors in these chapter 11 cases, along with the last four digits of their respective federal tax identification numbers, are: Reliz Technology Group Holdings Inc. (6265); Reliz Technologies LLC (1968); Reliz LTD (N/A); and Reliz CI LTD (N/A). The Debtors' service address is 401 West Ontario St., Suite 400, Chicago, IL 60654.

Dated: April 24, 2026

MORRIS JAMES LLP

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Proposed Counsel to the Official Committee of Unsecured Creditors

EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
RELIZ TECHNOLOGY GROUP HOLDINGS INC., *et al.*,	Case No. 26-10371 (TMH)
	(Jointly Administered)
Debtors.[1]	**Re: Docket No. __**

ORDER GRANTING THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION FOR AN ORDER PURSUANT TO BANKRUPTCY RULE 2004 AND LOCAL BANKRUPTCY RULE 2004-1 DIRECTING THE EXAMINATION AND PRODUCTION OF DOCUMENTS

Upon consideration of *The Official Committee of Unsecured Creditors' Motion for an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004-1 Directing the Examination and Production of Documents* (the "Motion"), and any responses thereto; and the Court having conducted a hearing on the Motion, and upon the record thereof; and after due deliberation thereon; and good and sufficient cause existing therefor,

IT IS HEREBY ORDERED:

1. The Motion is granted as set forth herein.

2. Each of the Relevant Parties is hereby ordered and directed to produce to the Official Committee of Unsecured Creditors (the "Committee") all documents within its possession, custody, or control that are responsive to the categories set forth on **Exhibit B** attached to the Motion on a rolling basis following the entry of this Order so as to be completed within seven (7) days of entry of this Order.

[1] The Debtors in these chapter 11 cases, along with the last four digits of their respective federal tax identification numbers, are: Reliz Technology Group Holdings Inc. (6265); Reliz Technologies LLC (1968); Reliz LTD (N/A); and Reliz CI LTD (N/A). The Debtors' service address is 401 West Ontario St., Suite 400, Chicago, IL 60654.

3. Each of the Relevant Parties shall appear and be examined, under oath, by the Committee on a date mutually agreed to between the Debtors and the Committee no later than seven (7) days after entry of this Order.

4. The Committee is authorized to issue additional subpoenas for deposition testimony and/or documents.

5. Nothing in this Order shall be deemed to limit the Committee's right to seek further discovery, including but not limited to additional documents and communications, the Committee's right to alter or supplement the current Subpoenas[2], or to issue further discovery requests.

6. During its investigation, the Committee may identify additional persons or entities from which it requires oral examinations and/or document productions in relation to the Requests. Under such circumstances, the Committee is authorized to file a "Notice of Additional Entities Subject to Rule 2004 Examination" on the docket in the Chapter 11 Cases describing the documents sought from any additional Rule 2004 party and, following a meet and confer with such additional Rule 2004 party (which meet and confer shall take place no more than forty-eight (48) hours after the filing of such notice), the Committee shall be authorized, without further order of the Court, to issue subpoena(s) and document requests to the additional Rule 2004 party setting forth the date and time of the oral examination of and document production by such party (which, absent further order of this Court or written agreement with such party, will set a date for production that is seven (7) days after service of the subpoena(s) and a date for oral examination that is no less than seven (7) days thereafter); *provided, however*, that such additional Rule 2004 party shall have five (5)

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

days from the service of such subpoena to object to the relevance, scope, burden or procedure of the document requests included in such subpoena.

7. The Committee may identify additional persons or entities from which it requires oral examinations and/or document productions in relation to the Subpoenas and is authorized to file a "Notice of Additional Document Production or Oral Examination," without further order of the Court, to issue subpoena(s) to the Relevant Parties or the additional Rule 2004 party, as applicable, setting forth the date and time of the examination of and document production (which, absent further order of this Court or written agreement with such party, will set a date for production that is seven (7) days after service of the subpoena(s) and a date for oral examination that is no less than seven (7) days thereafter); *provided, however*, that the party shall have five (5) days from the service of such subpoena to object to the relevance, scope, burden or procedure of the document requests included in such subpoena.

8. The Committee is authorized to take all actions deemed necessary to effectuate the relief granted in this Order.

9. This Order shall become effective immediately upon its entry notwithstanding anything in the Federal Rules of Bankruptcy Procedure or otherwise to the contrary.

10. This Court shall retain jurisdiction to resolve any disputes arising from or related to this Order, and to interpret, implement, and enforce the provisions of this Order.

EXHIBIT B

Subpoenas

Schedule 1

Subpoena - D&Os

DEFINITIONS

The following terms used in this subpoena (the "Subpoena") shall have the following meanings in addition to any other meaning they may have, and the definitions set forth herein shall apply regardless of whether the defined term is capitalized:

1. "***All***," "***each***," and "***any***" shall be construed as encompassing "each and every", "any and all", and "any one".

2. "***And***" and "***or***" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

3. "***Bankruptcy Code***" means the Title 11 of the United States Code.

4. "***Budget***" means the proposed budget underlying the Third Interim Cash Collateral Order [D.I. 225].

5. "***Celsius***" means Celsius Network Ltd.

6. "***Celsius Notes***" means the two promissory notes entered into by the Debtors and Celsius on or about June 14, 2024, which outline the parameters by which the Debtors would pay $3,602,140.82 upfront with the remaining $12,651,011.70 paid over a period, as more fully outlined in the Debtors' pleadings.

7. "***Chapter 11 Cases***" means the chapter 11 cases filed by the Debtors in the United States Bankruptcy Court for the District of Delaware (jointly administered under Case Number: 26-10371 (TMH)).

8. "***Communication***" is used in its broadest sense and includes, but is not limited to, any transmission or exchange of information between two or more persons, whether orally, in writing, or by electronic means. This includes without limitation any conversation or discussion

by means of letter, note, memorandum, inter-office correspondence, telephone, telegraph, telex, telecopies, cable, data processors, or any other medium. For the avoidance of doubt, the term "Communication" expressly includes electronic mail messages, text messages, chat messages, social media posts, and messages sent via mobile messaging applications (including, but not limited to, iMessage, WhatsApp, Slack, Signal, Zoom, Teams, and Telegram). The term "Communication" is not limited to internal Communications but includes Communications between the Debtors and third parties and Communications between or among third parties. For further avoidance of doubt, all Communications fall within the scope of the definition of "Document."

9. "***Concerning***," "***regarding***," or "***relating to***" means in any way, directly or indirectly, alluding to, amending, assisting with, canceling, commenting on, comprising, concerning, confirming, considering, contradicting, describing, discussing, endorsing, evidencing, identifying, incorporating, mentioning, modifying, negating, negotiating, pertaining to, qualifying, referring to, regarding, relating to, relevant to, representing, revoking, showing, suggesting, supplementing, supporting, terminating, underlying, or otherwise involving the subject matter of the specified request.

10. "***Customer Assets***" means all digital assets, including but not limited to, bitcoin, fiat, ethereum, stablecoin, and other digital assets, deposited on the Debtors' platform, originally placed in customer's wallets, and all other forms of assets originating from a customer or that a customer had a property interest in.

11. "***D&O***" means director and officer.

12. "***Debtors***" or "***BlockFills***" means Reliz Technology Group Holdings Inc., Reliz Technologies LLC, Reliz LTD, and Reliz CI LTD.

13. "***Debtors' Former Employees***" means John Divine; Ray Nasser; and other former employees of the Debtors.

14. ***"Digital Asset Lending Agreement***" means that agreement entered into by the Debtors and Celsius on December 3, 2019.

15. "***Document(s)***" means all writings, audio recordings and videos of any nature whatsoever (including, specifically, all drafts), whether originals or copies, including all non-identical copies (whether different from the original because of notes made on or attached to them or otherwise), whether drafts, preliminary, proposed or final versions, whether printed, recorded, produced or reproduced by any other mechanical or electronic process, whether written or produced by hand, within Your possession, custody or control, including without limitation, contracts, agreements, arrangements, understandings, Communications, correspondence, records, reports, studies, memoranda (including memoranda of telephone, personal or intra-office conversations and memoranda of conferences, notes, advertisements, notices, facsimile Communications), Phone Records, Videoconferencing Records, diaries, forecasts, accountants' work papers, graphs, summaries, lists, tabulations, charts, diagrams, blueprints, tables, indices, pictures, recordings, tapes, charges, accounts, minutes, press releases, stenographic, handwritten or any other notes, projections, working papers, checks, check stubs, receipts, or any other document or writings of whatever description, including, without limitation, e-mails, instant messages, text messages, ESI or other electronic chats or messages and any information contained in any computer or memory system, although not yet printed out, or any material underlying, supporting or used in the preparation of any such documents.

16. "***ESI***" or "***Electronically Stored Information***" means information or data that is generated, received, processed, and recorded by computers and other electronic devices, and

includes, without limitation, system metadata (e.g., author, recipient, file creation date, file modification date) and user-generated metadata (e.g., spreadsheet formulas). "ESI" further includes, without limitation, the following: (i) output resulting from the use of any software program, such as word processing documents, spreadsheets, database files, charts, graphs, and outlines, (ii) electronic mail, (iii) message logs from Google Chat, AOL Instant Messenger, Facebook, Twitter, WhatsApp, Telegram, and similar programs, (iv) audio and video files, (v) internal (intranet) or external websites, and (vi) activity listings of electronic mail receipts and/or transmittals. "ESI" includes electronic information or data wherever it resides, including, without limitation, (i) Facebook, Instagram or other social media, (ii) in an active file on a computer network, an individual computer's hard drive or in a Cloud storage facility, (ii) in a deleted file or file fragment, (iii) on backup/storage media, (iv) on removable media, such as a floppy disk, memory stick, portable hard drive, or zip drive, and (v) on a smart phone or personal digital assistant. "ESI" also includes Documents, containers and labels appended to or concerning any physical storage device associated with responsive electronic information or data.

17. *"**First Day Declaration**"* means *the Declaration of Mark Renzi in Support of Chapter 11 Petition and First Day Motions, filed by the Debtors on March 15, 2026*, at D.I. 3.

18. "***Identify***" means (a) with respect to persons, to give, to the extent known, the person's full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment; (b) with respect to documents, either (i) to give, to the extent known, the (A) type of document; (B) general subject matter; (C) date of the document; and (D) author(s), addressee(s) and recipient(s); or (ii) to produce the documents, together with sufficient identifying information to satisfy Federal Rule of Civil Procedure 33(d).

19. "***Including***," "***include***," or "***includes***" shall mean "including, without limitation."

20. "***Person***" means any natural person or any legal entity, including, without limitation, any business or governmental entity or association.

21. "***Petition Date***" means the Chapter 11 Cases filed by the Debtors on March 15, 2026.

22. *"**Phone Records**"* mean all Documents, including telephone bills, recordings, transcripts, call summaries, telephone logs, and/or invoices for telephone conferencing services, that identify the date, time, duration, participants, telephone numbers, and/or proposed or actual subject matter of any telephone call.

23. "***Reflecting***" means constituting, embodying, memorializing, representing, or containing in any manner.

24. "***Request***" means any request for the production of documents set forth herein.

25. "***You***" and "***Your***" means the recipient of these Requests or Subpoena and any affiliate, representative, agent, or employee of the same.

INSTRUCTIONS

1. Unless otherwise indicated in a particular Request, the date range of these Requests shall be January 1, 2022 through the date of the response hereto.

2. Documents shall be produced as they have been kept in the ordinary course of business. In this respect, the file folder in which the documents are contained is deemed an integral part of the document and shall also be produced. You are specifically requested to produce any excel spreadsheets in native format.

3. The singular shall include the plural and the plural shall include the singular; the conjunctive shall include the disjunctive and the disjunctive shall include the conjunctive.

4. If any Document is withheld, in whole or in part, on the basis of privilege, the producing party shall provide a proper privilege log at the time of the document production.

5. These Requests extend to all documents in a producing party's possession, custody and/or control, or in the possession, custody or control of persons or entities under the producing party's control, whether such documents were created or prepared by the producing party. The terms "possession," "custody," and "control" mean possession, custody or control, or rights to possession, custody or control, of documents by producing party, including Documents in the possession of any attorneys, without limitation, and documents in the custody, possession or control of any of the producing party's accountants, advisers, representatives and/or other agents of same.

6. Each reference to a corporation, partnership, joint venture, unincorporated association, government agency or other fictitious person shall be deemed to include each and all of its subsidiaries, affiliates, predecessors and successors, and with respect to each of such entities, its officers, directors, shareholders, employees, partners, limited partners, representatives, agents, accountants, attorneys and any other person who acted or purported to act on its behalf.

7. Each reference to a natural person shall be deemed to include that person's agents, attorneys, representatives and any other person who acted or purported to act on that person's behalf.

8. In responding to these Requests, which are continuing in nature, the producing party shall produce all responsive documents in their possession, custody and/or control and shall promptly supplement and/or correct its responses if the producing party comes into possession, custody or control of additional documents, or learns or determines additional information, after the service of its response.

9. If any portion of any Document is responsive to any Request(s), the entire Document, including the attachments, disclosures, and/or exhibits must be produced.

10. No attached Documents should be separated from each other.

11. To the extent that You deem or consider any Request to be ambiguous, You must set forth the matter deemed ambiguous and the construction You adopted to respond to the Request.

12. If, after a reasonable and thorough investigation using due diligence, the producing party is unable to furnish a document or part thereof because a document is not available to the producing party, the producing party shall provide a list of each document so lost, destroyed or otherwise unavailable, together with the following information: (a) date or origin; (b) brief description of such document; (c) author of the document; (d) date upon which the document was lost or destroyed; and (e) brief statement of the manner in which such document was lost or destroyed.

13. Electronic data should be produced with all native files and metadata intact, in full-text searchable format. Any responsive, electronically stored data shall be converted/processed to TIFF files and Bates numbered, and include fully searchable text. Additionally, email and native file collections should include linked native files. Documents must be produced with load files necessary to load such documents onto Relativity. Images should be single-page TIFF files and file names cannot contain embedded spaces. The text and metadata of emails and the attachments, and native file document collections should be extracted and provided in a .DAT file. Searchable text of the entire document must be provided for every record, at the document level, and extracted text must be provided for documents that originated in electronic format.

14. If there are no documents responsive to a category in this Request, so state in writing.

15. The producing party shall follow all deadlines and procedures under applicable law. Objecting to a portion of a Request does not relieve the producing party of the duty to respond to those parts of the Request to which the producing party does not object.

REQUESTS

1. All Documents and Communications between You and actual and potential investors of BlockFills.

2. All Documents and Communications regarding Your employment and/or relationship with the Debtors.

3. All Documents and Communications regarding regulatory requirements to operate Debtors' business operations.

4. All Documents and Communications related to the interpretation of customer contracts and agreements.

5. All Documents and Communications related to Customer Assets.

6. All Documents and Communications relating to any insolvency opinions, whether formal or informal, or other analyses with respect to solvency, rendered with respect to the Debtors.

7. All Documents relating to audited financials for each Debtor entity.

8. All Documents and Communications related to the Digital Asset Lending Agreement.

9. All Documents and Communications between You and customers.

10. All Documents and Communications related to the business practices of the Debtors.

11. All Documents and Communications regarding the Debtors' marketing materials.

12. All Documents and Communications related to draft and final board materials, minutes, or presentations.

13. All Documents and Communications between You and other D&Os or Debtors' Former Employees.

14. All financial statements, including balance sheets and profit and loss statements, whether audited or unaudited, and any related spreadsheets, statements, calculations, or projections, of the Debtors or of any of them, collectively or separately, for any date or period of time between March 15, 2022, and the Petition Date.

15. All documents reflecting any purchases or other acquisitions by the Debtors of any mining equipment, at any time from January 1, 2021 to the Petition Date.

16. All documents reflecting any sales, assignments, gifts or other transfers by the Debtors of any mining equipment, at any time from January 1, 2021 to the Petition Date.

17. All financial statements, including balance sheets and profit and loss statements, whether audited or unaudited, and any related spreadsheets, statements, calculations, or projections, of any of the following nondebtor affiliates, with respect to any date or period of time between January 1, 2025 and the Petition Date:

a. Reliz Technologies LLC, a Wyoming limited liability company;
b. Basis Group Holdings, Inc., an entity with its offices in Chicago, Illinois;
c. Basis Capital Markets UK Limited, a United Kingdom entity located in London;
d. Blockfils Digital Markets Ltd., a Cayman Islands entity;
e. Cerus Digital Master Fund SPC, a Cayman Islands entity;
f. Cerus Digital Offshore Fund SPC, a Cayman Islands entity; and
g. Cerus Digital Asset Management LLC, an Illinois limited liability company.

18. All documents concerning or reflecting (a) any sales, assignments, gifts or other transfers by the Debtors, at any time from January 1, 2021 to the Petition Date, of any

cryptocurrency or other controllable electronic record (CER) that had been transferred from a customer account to a commingled account controlled by one or more of the Debtors, and (b) the disposition of any property received by the Debtors or any of them pursuant to any such sale, exchange or transfer.

19. All marketing materials, website content, customer presentations, account opening documentation, and Communications that made representations to customers regarding asset custody, segregation of customer funds, safety of deposits, or protection of customer assets.

20. All Documents and Communications with accountants or auditors engaged by the Debtors.

21. All wallet addresses controlled by or associated with any of the Debtors, including hot, cold, omnibus, and operational wallets.

22. All Documents reflecting the custody arrangements for digital assets, including any third-party custodial agreements, multi-signature authorization protocols, key management procedures, and disaster recovery plans.

TOPICS FOR EXAMINATION

1. The facts and circumstances surrounding Your position with the Debtors' or position on the Debtors' board of directors, including Communications regarding same.

2. The facts and circumstances related to the Debtors' Budget, including Communications regarding same.

3. The facts and circumstances described in the First Day Declaration, including Documents and Communications regarding same.

4. All Communications between You and Celsius related to, among other things, the Debtors' sale process, cash collateral, and/or Term Sheet, whether on behalf of You or another person.

5. The facts and circumstances related to the potential misuses of company or customer accounts, conflicts of interest, and conduct by management that was improper or inconsistent with company representations to third parties, including Communications regarding same.

6. The facts and circumstances related to discussions with D&Os or Debtors' Former Employees.

Schedule 2

Subpoena – Prepetition Lenders

DEFINITIONS

The following terms used in this subpoena (the "Subpoena") shall have the following meanings in addition to any other meaning they may have, and the definitions set forth herein shall apply regardless of whether the defined term is capitalized:

1. "***All***," "***each***," and "***any***" shall be construed as encompassing "each and every", "any and all", and "any one".

2. "***And***" and "***or***" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

3. "***Bankruptcy Code***" means the Title 11 of the United States Code.

4. "***Celsius***" means Celsius Network Ltd.

5. "***Celsius Notes***" means the two promissory notes entered into by the Debtors and Celsius on or about June 14, 2024, which outline the parameters by which the Debtors would pay $3,602,140.82 upfront with the remaining $12,651,011.70 paid over a period, as more fully outlined in the Debtors' pleadings.

6. "***Chapter 11 Cases***" means the chapter 11 cases filed by the Debtors in the United States Bankruptcy Court for the District of Delaware (jointly administered under Case Number: 26-10371 (TMH)).

7. "***Communication***" is used in its broadest sense and includes, but is not limited to, any transmission or exchange of information between two or more persons, whether orally, in writing, or by electronic means. This includes without limitation any conversation or discussion by means of letter, note, memorandum, inter-office correspondence, telephone, telegraph, telex, telecopies, cable, data processors, or any other medium. For the avoidance of doubt, the term

"Communication" expressly includes electronic mail messages, text messages, chat messages, social media posts, and messages sent via mobile messaging applications (including, but not limited to, iMessage, WhatsApp, Slack, Signal, Zoom, and Teams). The term "Communication" is not limited to internal Communications but includes Communications between the Debtors and third parties and Communications between or among third parties. For further avoidance of doubt, all Communications fall within the scope of the definition of "Document."

8. "***Concerning***," "***regarding***," or "***relating to***" means in any way, directly or indirectly, alluding to, amending, assisting with, canceling, commenting on, comprising, concerning, confirming, considering, contradicting, describing, discussing, endorsing, evidencing, identifying, incorporating, mentioning, modifying, negating, negotiating, pertaining to, qualifying, referring to, regarding, relating to, relevant to, representing, revoking, showing, suggesting, supplementing, supporting, terminating, underlying, or otherwise involving the subject matter of the specified request.

9. "***Customer Assets***" means all digital assets, including but not limited to, bitcoin, fiat, ethereum, stablecoin, and other digital assets, deposited on the Debtors' platform, originally placed in customer's wallets, and all other forms of assets originating from a customer or that a customer had a property interest in.

10. "***D&O***" means director and officer.

11. "***Debtors***" or "***BlockFills***" means Reliz Technology Group Holdings Inc., Reliz Technologies LLC, Reliz LTD, and Reliz CI LTD.

12. "***Debtors' Former Employees***" means John Divine; Ray Nasser; and other former employees of the Debtors.

13. ***"Digital Asset Lending Agreement***" means that agreement entered into by the Debtors and Celsius on December 3, 2019.

14. "***Document(s)***" means all writings, audio recordings and videos of any nature whatsoever (including, specifically, all drafts), whether originals or copies, including all non-identical copies (whether different from the original because of notes made on or attached to them or otherwise), whether drafts, preliminary, proposed or final versions, whether printed, recorded, produced or reproduced by any other mechanical or electronic process, whether written or produced by hand, within Your possession, custody or control, including without limitation, contracts, agreements, arrangements, understandings, Communications, correspondence, records, reports, studies, memoranda (including memoranda of telephone, personal or intra-office conversations and memoranda of conferences, notes, advertisements, notices, facsimile Communications), Phone Records, Videoconferencing Records, diaries, forecasts, accountants' work papers, graphs, summaries, lists, tabulations, charts, diagrams, blueprints, tables, indices, pictures, recordings, tapes, charges, accounts, minutes, press releases, stenographic, handwritten or any other notes, projections, working papers, checks, check stubs, receipts, or any other document or writings of whatever description, including, without limitation, e-mails, instant messages, text messages, ESI or other electronic chats or messages and any information contained in any computer or memory system, although not yet printed out, or any material underlying, supporting or used in the preparation of any such documents.

15. "***ESI***" or "***Electronically Stored Information***" means information or data that is generated, received, processed, and recorded by computers and other electronic devices, and includes, without limitation, system metadata (e.g., author, recipient, file creation date, file modification date) and user-generated metadata (e.g., spreadsheet formulas). "ESI" further

includes, without limitation, the following: (i) output resulting from the use of any software program, such as word processing documents, spreadsheets, database files, charts, graphs, and outlines, (ii) electronic mail, (iii) message logs from Google Chat, AOL Instant Messenger, Facebook, Twitter, WhatsApp, Telegram, and similar programs, (iv) audio and video files, (v) internal (intranet) or external websites, and (vi) activity listings of electronic mail receipts and/or transmittals. "ESI" includes electronic information or data wherever it resides, including, without limitation, (i) Facebook, Instagram or other social media, (ii) in an active file on a computer network, an individual computer's hard drive or in a Cloud storage facility, (ii) in a deleted file or file fragment, (iii) on backup/storage media, (iv) on removable media, such as a floppy disk, memory stick, portable hard drive, or zip drive, and (v) on a smart phone or personal digital assistant. "ESI" also includes Documents, containers and labels appended to or concerning any physical storage device associated with responsive electronic information or data.

16. "***First Day Declaration***" means the Declaration of Mark Renzi in Support of Chapter 11 Petition and First Day Motions, filed by the Debtors on March 15, 2026, at D.I. 3.

17. "***Identify***" means (a) with respect to persons, to give, to the extent known, the person's full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment; (b) with respect to documents, either (i) to give, to the extent known, the (A) type of document; (B) general subject matter; (C) date of the document; and (D) author(s), addressee(s) and recipient(s); or (ii) to produce the documents, together with sufficient identifying information to satisfy Federal Rule of Civil Procedure 33(d).

18. "***Including***," "***include***," or "***includes***" shall mean "including, without limitation."

19. "***Person***" means any natural person or any legal entity, including, without limitation, any business or governmental entity or association.

20. "***Petition Date***" means the Chapter 11 Cases filed by the Debtors on March 15, 2026.

21. *"**Phone Records**"* mean all Documents, including telephone bills, recordings, transcripts, call summaries, telephone logs, and/or invoices for telephone conferencing services, that identify the date, time, duration, participants, telephone numbers, and/or proposed or actual subject matter of any telephone call.

22. "***Reflecting***" means constituting, embodying, memorializing, representing, or containing in any manner.

23. "***Request***" means any request for the production of documents set forth herein.

24. "***You***" and "***Your***" means Celsius.

INSTRUCTIONS

1. Unless otherwise indicated in a particular Request, the date range of these Requests shall be January 1, 2022 through the date of the response hereto.

2. Documents shall be produced as they have been kept in the ordinary course of business. In this respect, the file folder in which the documents are contained is deemed an integral part of the document and shall also be produced. You are specifically requested to produce any excel spreadsheets in native format.

3. The singular shall include the plural and the plural shall include the singular; the conjunctive shall include the disjunctive and the disjunctive shall include the conjunctive.

4. If any Document is withheld, in whole or in part, on the basis of privilege, the producing party shall provide a proper privilege log at the time of the document production.

5. These Requests extend to all documents in a producing party's possession, custody and/or control, or in the possession, custody or control of persons or entities under the producing party's control, whether such documents were created or prepared by the producing party. The

terms "possession," "custody," and "control" mean possession, custody or control, or rights to possession, custody or control, of documents by producing party, including Documents in the possession of any attorneys, without limitation, and documents in the custody, possession or control of any of the producing party's accountants, advisers, representatives and/or other agents of same.

6. Each reference to a corporation, partnership, joint venture, unincorporated association, government agency or other fictitious person shall be deemed to include each and all of its subsidiaries, affiliates, predecessors and successors, and with respect to each of such entities, its officers, directors, shareholders, employees, partners, limited partners, representatives, agents, accountants, attorneys and any other person who acted or purported to act on its behalf.

7. Each reference to a natural person shall be deemed to include that person's agents, attorneys, representatives and any other person who acted or purported to act on that person's behalf.

8. In responding to these Requests, which are continuing in nature, the producing party shall produce all responsive documents in their possession, custody and/or control and shall promptly supplement and/or correct its responses if the producing party comes into possession, custody or control of additional documents, or learns or determines additional information, after the service of its response.

9. If any portion of any Document is responsive to any Request(s), the entire Document, including the attachments, disclosures, and/or exhibits must be produced.

10. No attached Documents should be separated from each other.

11. To the extent that You deem or consider any Request to be ambiguous, You must set forth the matter deemed ambiguous and the construction You adopted to respond to the Request.

12. If, after a reasonable and thorough investigation using due diligence, the producing party is unable to furnish a document or part thereof because a document is not available to the producing party, the producing party shall provide a list of each document so lost, destroyed or otherwise unavailable, together with the following information: (a) date or origin; (b) brief description of such document; (c) author of the document; (d) date upon which the document was lost or destroyed; and (e) brief statement of the manner in which such document was lost or destroyed.

13. Electronic data should be produced with all native files and metadata intact, in full-text searchable format. Any responsive, electronically stored data shall be converted/processed to TIFF files and Bates numbered, and include fully searchable text. Additionally, email and native file collections should include linked native files. Documents must be produced with load files necessary to load such documents onto Relativity. Images should be single-page TIFF files and file names cannot contain embedded spaces. The text and metadata of emails and the attachments, and native file document collections should be extracted and provided in a .DAT file. Searchable text of the entire document must be provided for every record, at the document level, and extracted text must be provided for documents that originated in electronic format.

14. If there are no documents responsive to a category in this Request, so state in writing.

15. The producing party shall follow all deadlines and procedures under applicable law. Objecting to a portion of a Request does not relieve the producing party of the duty to respond to those parts of the Request to which the producing party does not object.

REQUESTS

1. All Documents or Communications relating to any financial reporting, analysis, or presentations generated by the Debtors.

2. All Documents and Communications between You and the Debtors, D&Os, and/or Former Employees.

3. All Documents and Communication regarding any agreement(s) entered into between You and one or more of the Debtors.

4. All Documents and Communications relating to any insolvency opinions, whether formal or informal, or other analyses with respect to solvency, rendered with respect to the Debtors.

5. All Documents relating to audited financials for each Debtor entity.

6. All Documents relating to any financial reporting, analysis, or presentations generated by the Debtors.

7. All Documents and Communications related to the business practices of the Debtors.

8. All Documents supporting any alleged security interest in the Debtors' assets.

9. All Documents and Communications supporting any alleged claims against the Debtors.

10. All financial statements, including balance sheets and profit and loss statements, whether audited or unaudited, and any related spreadsheets, statements, calculations, or

projections, of the Debtors or of any of them, collectively or separately, for any date or period of time between March 15, 2022, and the Petition Date.

11. All Documents reflecting any purchases or other acquisitions by the Debtors of any mining equipment, at any time from January 1, 2021 to the Petition Date.

12. All Documents reflecting any sales, assignments, gifts or other transfers by the Debtors of any mining equipment, at any time from January 1, 2021 to the Petition Date.

13. All financial statements, including balance sheets and profit and loss statements, whether audited or unaudited, and any related spreadsheets, statements, calculations, or projections, of any of the following nondebtor affiliates, with respect to any date or period of time between January 1, 2025 and the Petition Date:

a. Reliz Technologies LLC, a Wyoming limited liability company;
b. Basis Group Holdings, Inc., an entity with its offices in Chicago, Illinois;
c. Basis Capital Markets UK Limited, a United Kingdom entity located in London;
d. Blockfils Digital Markets Ltd., a Cayman Islands entity;
e. Cerus Digital Master Fund SPC, a Cayman Islands entity;
f. Cerus Digital Offshore Fund SPC, a Cayman Islands entity; and
g. Cerus Digital Asset Management LLC, an Illinois limited liability company.

14. All Documents concerning or reflecting (a) any sales, assignments, gifts or other transfers by the Debtors, at any time from January 1, 2021 to the Petition Date, of any cryptocurrency or other controllable electronic record (CER) that had been transferred from a customer account to a commingled account controlled by one or more of the Debtors, and (b) the disposition of any property received by the Debtors or any of them pursuant to any such sale, exchange or transfer.

15. All Documents and Communications between You and any D&O or Debtors' Former Employees.

16. All loan agreements, credit facilities, promissory notes, security agreements, guarantees, and related Documents and Communications concerning any loans, advances, or extensions of credit to or from the Debtors, including all term sheets, amendments, default notices, forbearance agreements, and correspondence regarding negotiation, structuring, performance, defaults, or disputes from three (3) years prior to the petition date.

17. All Documents and Communications concerning the Celsius arbitration, including the arbitration decision, pleadings, evidence submitted, settlement discussions, and any internal Communications regarding the structuring of the underlying transaction, potential liability exposure, or advice received from counsel or other advisors.

TOPICS FOR EXAMINATION

1. The facts and circumstances surrounding any agreements between You and the Debtors, including all amendment thereto.

2. The facts and circumstances described in the First Day Declaration, including Documents and Communications regarding same.

3. The facts and circumstances related to the status of any loan or financing agreement between You and the Debtors.

4. The facts and circumstances related to any legal dispute between You and the Debtors.

5. The facts and circumstances related to discussions between You and D&Os and/or the Debtors' Former Employees.

Schedule 3

First Requests – Former Employees

DEFINITIONS

The following terms used in this subpoena (the "Subpoena") shall have the following meanings in addition to any other meaning they may have, and the definitions set forth herein shall apply regardless of whether the defined term is capitalized:

1. "***All***," "***each***," and "***any***" shall be construed as encompassing "each and every", "any and all", and "any one".

2. "***And***" and "***or***" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

3. "***Bankruptcy Code***" means the Title 11 of the United States Code.

4. "***Celsius***" means Celsius Network Ltd.

5. "***Celsius Notes***" means the two promissory notes entered into by the Debtors and Celsius on or about June 14, 2024, which outline the parameters by which the Debtors would pay $3,602,140.82 upfront with the remaining $12,651,011.70 paid over a period, as more fully outlined in the Debtors' pleadings.

6. "***Chapter 11 Cases***" means the chapter 11 cases filed by the Debtors in the United States Bankruptcy Court for the District of Delaware (jointly administered under Case Number: 26-10371 (TMH)).

7. "***Communication***" is used in its broadest sense and includes, but is not limited to, any transmission or exchange of information between two or more persons, whether orally, in writing, or by electronic means. This includes without limitation any conversation or discussion by means of letter, note, memorandum, inter-office correspondence, telephone, telegraph, telex, telecopies, cable, data processors, or any other medium. For the avoidance of doubt, the term

"Communication" expressly includes electronic mail messages, text messages, chat messages, social media posts, and messages sent via mobile messaging applications (including, but not limited to, iMessage, WhatsApp, Slack, Signal, Zoom, and Teams). The term "Communication" is not limited to internal Communications but includes Communications between the Debtors and third parties and Communications between or among third parties. For further avoidance of doubt, all Communications fall within the scope of the definition of "Document."

8. "***Concerning***," "***regarding***," or "***relating to***" means in any way, directly or indirectly, alluding to, amending, assisting with, canceling, commenting on, comprising, concerning, confirming, considering, contradicting, describing, discussing, endorsing, evidencing, identifying, incorporating, mentioning, modifying, negating, negotiating, pertaining to, qualifying, referring to, regarding, relating to, relevant to, representing, revoking, showing, suggesting, supplementing, supporting, terminating, underlying, or otherwise involving the subject matter of the specified request.

9. "***Customer Assets***" means all digital assets, including but not limited to, bitcoin, fiat, ethereum, stablecoin, and other digital assets, deposited on the Debtors' platform, originally placed in customer's wallets, and all other forms of assets originating from a customer or that a customer had a property interest in.

10. "***D&O***" means director and officer.

11. "***Debtors***" or "***BlockFills***" means Reliz Technology Group Holdings Inc., Reliz Technologies LLC, Reliz LTD, and Reliz CI LTD.

12. "***Debtors' Former Employees***" means John Divine; Ray Nasser; and other former employees of the Debtors.

13. ***"Digital Asset Lending Agreement***" means that agreement entered into by the Debtors and Celsius on December 3, 2019.

14. "***Document(s)***" means all writings, audio recordings and videos of any nature whatsoever (including, specifically, all drafts), whether originals or copies, including all non-identical copies (whether different from the original because of notes made on or attached to them or otherwise), whether drafts, preliminary, proposed or final versions, whether printed, recorded, produced or reproduced by any other mechanical or electronic process, whether written or produced by hand, within Your possession, custody or control, including without limitation, contracts, agreements, arrangements, understandings, Communications, correspondence, records, reports, studies, memoranda (including memoranda of telephone, personal or intra-office conversations and memoranda of conferences, notes, advertisements, notices, facsimile Communications), Phone Records, Videoconferencing Records, diaries, forecasts, accountants' work papers, graphs, summaries, lists, tabulations, charts, diagrams, blueprints, tables, indices, pictures, recordings, tapes, charges, accounts, minutes, press releases, stenographic, handwritten or any other notes, projections, working papers, checks, check stubs, receipts, or any other document or writings of whatever description, including, without limitation, e-mails, instant messages, text messages, ESI or other electronic chats or messages and any information contained in any computer or memory system, although not yet printed out, or any material underlying, supporting or used in the preparation of any such documents.

15. "***ESI***" or "***Electronically Stored Information***" means information or data that is generated, received, processed, and recorded by computers and other electronic devices, and includes, without limitation, system metadata (e.g., author, recipient, file creation date, file modification date) and user-generated metadata (e.g., spreadsheet formulas). "ESI" further

includes, without limitation, the following: (i) output resulting from the use of any software program, such as word processing documents, spreadsheets, database files, charts, graphs, and outlines, (ii) electronic mail, (iii) message logs from Google Chat, AOL Instant Messenger, Facebook, Twitter, WhatsApp, Telegram, and similar programs, (iv) audio and video files, (v) internal (intranet) or external websites, and (vi) activity listings of electronic mail receipts and/or transmittals. "ESI" includes electronic information or data wherever it resides, including, without limitation, (i) Facebook, Instagram or other social media, (ii) in an active file on a computer network, an individual computer's hard drive or in a Cloud storage facility, (ii) in a deleted file or file fragment, (iii) on backup/storage media, (iv) on removable media, such as a floppy disk, memory stick, portable hard drive, or zip drive, and (v) on a smart phone or personal digital assistant. "ESI" also includes Documents, containers and labels appended to or concerning any physical storage device associated with responsive electronic information or data.

16. "***First Day Declaration***" means the *Declaration of Mark Renzi in Support of Chapter 11 Petition and First Day Motions, filed by the Debtors* on March 15, 2026, at D.I. 3.

17. "***Identify***" means (a) with respect to persons, to give, to the extent known, the person's full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment; (b) with respect to documents, either (i) to give, to the extent known, the (A) type of document; (B) general subject matter; (C) date of the document; and (D) author(s), addressee(s) and recipient(s); or (ii) to produce the documents, together with sufficient identifying information to satisfy Federal Rule of Civil Procedure 33(d).

18. "***Including***," "***include***," or "***includes***" shall mean "including, without limitation."

19. "***Person***" means any natural person or any legal entity, including, without limitation, any business or governmental entity or association.

20. "***Petition Date***" means the Chapter 11 Cases filed by the Debtors on March 15, 2026.

21. *"**Phone Records**"* mean all Documents, including telephone bills, recordings, transcripts, call summaries, telephone logs, and/or invoices for telephone conferencing services, that identify the date, time, duration, participants, telephone numbers, and/or proposed or actual subject matter of any telephone call.

22. "***Reflecting***" means constituting, embodying, memorializing, representing, or containing in any manner.

23. "***Request***" means any request for the production of documents set forth herein.

24. "***You***" and "***Your***" means the recipient of this Subpoena.

INSTRUCTIONS

1. Unless otherwise indicated in a particular Request, the date range of these Requests shall be January 1, 2022 through the date of the response hereto.

2. Documents shall be produced as they have been kept in the ordinary course of business. In this respect, the file folder in which the documents are contained is deemed an integral part of the document and shall also be produced. You are specifically requested to produce any excel spreadsheets in native format.

3. The singular shall include the plural and the plural shall include the singular; the conjunctive shall include the disjunctive and the disjunctive shall include the conjunctive.

4. If any Document is withheld, in whole or in part, on the basis of privilege, the producing party shall provide a proper privilege log at the time of the document production.

5. These Requests extend to all documents in a producing party's possession, custody and/or control, or in the possession, custody or control of persons or entities under the producing party's control, whether such documents were created or prepared by the producing party. The

terms "possession," "custody," and "control" mean possession, custody or control, or rights to possession, custody or control, of documents by producing party, including Documents in the possession of any attorneys, without limitation, and documents in the custody, possession or control of any of the producing party's accountants, advisers, representatives and/or other agents of same.

6. Each reference to a corporation, partnership, joint venture, unincorporated association, government agency or other fictitious person shall be deemed to include each and all of its subsidiaries, affiliates, predecessors and successors, and with respect to each of such entities, its officers, members, directors, shareholders, employees, partners, limited partners, representatives, agents, accountants, attorneys and any other person who acted or purported to act on its behalf.

7. Each reference to a natural person shall be deemed to include that person's agents, attorneys, representatives and any other person who acted or purported to act on that person's behalf.

8. In responding to these Requests, which are continuing in nature, the producing party shall produce all responsive documents in their possession, custody and/or control and shall promptly supplement and/or correct its responses if the producing party comes into possession, custody or control of additional documents, or learns or determines additional information, after the service of its response.

9. If any portion of any Document is responsive to any Request(s), the entire Document, including the attachments, disclosures, and/or exhibits must be produced.

10. No attached Documents should be separated from each other.

11. To the extent that You deem or consider any Request to be ambiguous, You must set forth the matter deemed ambiguous and the construction You adopted to respond to the Request.

12. If, after a reasonable and thorough investigation using due diligence, the producing party is unable to furnish a document or part thereof because a document is not available to the producing party, the producing party shall provide a list of each document so lost, destroyed or otherwise unavailable, together with the following information: (a) date or origin; (b) brief description of such document; (c) author of the document; (d) date upon which the document was lost or destroyed; and (e) brief statement of the manner in which such document was lost or destroyed.

13. Electronic data should be produced with all native files and metadata intact, in full-text searchable format. Any responsive, electronically stored data shall be converted/processed to TIFF files and Bates numbered, and include fully searchable text. Additionally, email and native file collections should include linked native files. Documents must be produced with load files necessary to load such documents onto Relativity. Images should be single-page TIFF files and file names cannot contain embedded spaces. The text and metadata of emails and the attachments, and native file document collections should be extracted and provided in a .DAT file. Searchable text of the entire document must be provided for every record, at the document level, and extracted text must be provided for documents that originated in electronic format.

14. If there are no documents responsive to a category in this Request, so state in writing.

15. The producing party shall follow all deadlines and procedures under applicable law. Objecting to a portion of a Request does not relieve the producing party of the duty to respond to those parts of the Request to which the producing party does not object.

REQUESTS

1. All Documents and Communications regarding Your employment and/or relationship with the Debtors.

2. All Documents and Communications regarding the drafting and amendment of customer contracts between the Debtors and potential and actual customers.

3. All Documents and Communications related to the interpretation of customer contracts and agreements.

4. All Documents and Communications related to the drafting of the terms and conditions of BlockFills.

5. All Documents related to any customer complaint regarding the Debtors.

6. All Documents relating to audited financials for each Debtor entity.

7. All Documents and Communications related to the Digital Asset Lending Agreement.

8. All Documents and Communications between You and any potential or actual customer.

9. All Documents related to the use of Customer Assets for Debtors' operational expenses and any other activities.

10. All Documents and Communications related to the business practices of the Debtors.

11. All financial statements, including balance sheets and profit and loss statements, whether audited or unaudited, and any related spreadsheets, statements, calculations, or projections, of the Debtors or of any of them, collectively or separately, for any date or period of time between March 15, 2022, and the Petition Date.

12. All Documents reflecting any purchases or other acquisitions by the Debtors of any mining equipment, at any time from January 1, 2021 to the Petition Date.

13. All Documents reflecting any sales, assignments, gifts or other transfers by the Debtors of any mining equipment, at any time from January 1, 2021 to the Petition Date.

14. All financial statements, including balance sheets and profit and loss statements, whether audited or unaudited, and any related spreadsheets, statements, calculations, or projections, of any of the following nondebtor affiliates, with respect to any date or period of time between January 1, 2025 and the Petition Date:

a. Reliz Technologies LLC, a Wyoming limited liability company;
b. Basis Group Holdings, Inc., an entity with its offices in Chicago, Illinois;
c. Basis Capital Markets UK Limited, a United Kingdom entity located in London;
d. Blockfils Digital Markets Ltd., a Cayman Islands entity;
e. Cerus Digital Master Fund SPC, a Cayman Islands entity;
f. Cerus Digital Offshore Fund SPC, a Cayman Islands entity; and
g. Cerus Digital Asset Management LLC, an Illinois limited liability company.

15. All Documents concerning or reflecting (a) any sales, assignments, gifts or other transfers by the Debtors, at any time from January 1, 2021 to the Petition Date, of any cryptocurrency or other controllable electronic record (CER) that had been transferred from a customer account to a commingled account controlled by one or more of the Debtors, and (b) the disposition of any property received by the Debtors or any of them pursuant to any such sale, exchange or transfer.

16. All marketing materials, website content, customer presentations, account opening documentation, and Communications that made representations to customers regarding asset custody, segregation of customer funds, safety of deposits, or protection of customer assets.

17. All Documents and Communications with accountants or auditors engaged by the Debtors.

18. All wallet addresses controlled by or associated with any of the Debtors, including hot, cold, omnibus, and operational wallets.

19. All Documents reflecting the custody arrangements for digital assets, including any third-party custodial agreements, multi-signature authorization protocols, key management procedures, and disaster recovery plans.

20. All Documents and Communications related to assets held in trust or custodial agreements for assets.

21. All Documents and Communications related to risk assessment of Debtors' operations.

TOPICS FOR EXAMINATION

1. The facts and circumstances surrounding your employment with the Debtors, including Communications regarding same.

2. The facts and circumstances related to the potential misuses of company or customer accounts, conflicts of interest, and conduct by management that was improper or inconsistent with company representations to third parties, including Communications regarding same.

3. The facts and circumstances described in the First Day Declaration, including Documents and Communications regarding same.

4. The facts and circumstances related to Your Communications with actual or potential customers.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: RELIZ TECHNOLOGY GROUP HOLDINGS INC., *et al.*, Debtors.[1]	Chapter 11 Case No. 26-10371 (TMH) (Jointly Administered)

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of April, 2026, I caused to be filed with the Court electronically, and I caused to be served a true and correct copy of *The Official Committee of Unsecured Creditors' Motion for an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004-1 Directing the Examination and Production of Documents* upon the parties that are registered to receive notice via the Court's CM/ECF notification system, and additional service was completed via electronic mail on the parties listed on the attached service list.

/s/ Samantha L. Rodriguez
Samantha L. Rodriguez (DE Bar No. 7524)

[1] The Debtors in these chapter 11 cases, along with the last four digits of their respective federal tax identification numbers, are: Reliz Technology Group Holdings Inc. (6265); Reliz Technologies LLC (1968); Reliz LTD (N/A); and Reliz CI LTD (N/A). The Debtors' service address is 401 West Ontario St., Suite 400, Chicago, IL 60654.

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Email
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DE Secretary of State	Delaware Secretary of State	Division of Corporations	Franchise Tax	PO Box 898		Dover	DE	19903	dosdoc_bankruptcy@state.de.us
DE State Treasury	Delaware State Treasury		820 Silver Lake Blvd., Suite 100			Dover	DE	19904	statetreasurer@state.de.us
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IRS	Internal Revenue Service	Centralized Insolvency Operation	PO Box 7346			Philadelphia	PA	19101-7346	
IRS	Internal Revenue Service	Centralized Insolvency Operation	2970 Market St			Philadelphia	PA	19104	
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Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Email
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