

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

MINING PROJECT WIND DOWN HOLDINGS,
INC. (f/k/a Compute North Holdings, Inc.), *et al.*,

Reorganized Debtors.¹

Chapter 11

Case No. 22-90273 (MI)

(Jointly Administered)

**MOTION OF LITIGATION TRUSTEE FOR
ENTRY OF AN ORDER DISALLOWING CERTAIN CLAIMS
FOR FAILURE TO FURNISH REQUESTED TAX INFORMATION**

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

Represented parties should act through their attorney.

¹ The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) (4534); Mining Project Wind Down LLC (f/k/a Compute North LLC) (7185); Mining Project Wind Down Corpus Christi LLC (f/k/a CN Corpus Christi LLC) (5551); Mining Project Wind Down Atoka LLC (f/k/a CN Atoka LLC) (4384); Mining Project Wind Down BS LLC (f/k/a CN Big Spring LLC) (4397); Mining Project Wind Down Colorado Bend LLC (f/k/a CN Colorado Bend LLC) (4610); Mining Project Wind Down Developments LLC (f/k/a CN Developments LLC) (2570); Mining Project Wind Down Equipment LLC (f/k/a CN Equipment LLC) (6885); Mining Project Wind Down King Mountain LLC (f/k/a CN King Mountain LLC) (7190); Mining Project Wind Down MDN LLC (f/k/a CN Minden LLC) (3722); Mining Project Wind Down Mining LLC (f/k/a CN Mining LLC) (5223); Mining Project Wind Down Pledgor LLC (f/k/a CN Pledgor LLC) (9871); Mining Project Wind Down Member LLC (f/k/a Compute North Member LLC) (8639); Mining Project Wind Down NC08 LLC (f/k/a Compute North NC08 LLC) (8069); Mining Project Wind Down NY09 LLC (f/k/a Compute North NY09 LLC) (5453); Mining Project Wind Down STHDAK LLC (f/k/a Compute North SD, LLC) (1501); Mining Project Wind Down Texas LLC (f/k/a Compute North Texas LLC) (1883); Mining Project Wind Down TX06 LLC (f/k/a Compute North TX06 LLC) (5921); and Mining Project Wind Down TX10 LLC (f/k/a Compute North TX10 LLC) (4238). The Debtors' service address for the purposes of these chapter 11 cases is 2305A Elmen Street, Houston, TX 77019.

Tribolet Advisors, LLC, as Litigation Trustee (the “**Litigation Trustee**”), by and through its undersigned counsel, hereby files this *Motion of Litigation Trustee for Entry of an Order Disallowing Certain Claims for Failure to Furnish Requested Tax Information* (the “**Motion**”).² This Motion is supported by the declaration of Jeffrey Schwendeman in support of the Motion, a copy of which is attached hereto as **Exhibit A** (the “**Schwendeman Declaration**”). In further support of the Motion, the Litigation Trustee respectfully states as follows:

Relief Requested

1. By this Motion, and pursuant to sections 105 and 1142 of title 11 of the United States Code (the “**Bankruptcy Code**”), the Litigation Trustee seeks entry of an order, substantially in the form attached hereto (the “**Proposed Order**” and, if entered, the “**Order**”), disallowing those claims held by Unresponsive TIN Claimants (as defined below) and enforcing the forfeiture of such claimants’ Litigation Trust interests and rights to any Distribution for failure to timely furnish Tax Information (as defined below) in accordance with Section 4.02 of the Litigation Trust Agreement.

Jurisdiction and Venue

2. The United States Bankruptcy Court for the Southern District of Texas (the “**Court**”) has jurisdiction over this Motion pursuant to 28 U.S.C. § 1334 and the Order of Reference to Bankruptcy Judges, General Order 2012-6 (S.D. Tex. May 24, 2012) (Hinojosa, C.J.).

3. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). In addition, the Litigation Trustee confirms his consent, pursuant to Rule 7008 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and Rule 7008-1 of the Bankruptcy Local Rules

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Plan or the Litigation Trust Agreement (each as defined herein), as applicable.

for the United States Bankruptcy Court for the Southern District of Texas (the “**Local Rules**”), to the entry of a final order by the Court in connection with this Motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

4. Venue of the Chapter 11 Cases and related proceedings is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

Background

5. On September 22, 2022 (the “**Petition Date**”), each of the above-captioned debtors (the “**Debtors**” and, as of the effective date of the Plan, the “**Reorganized Debtors**”) commenced a chapter 11 case by filing a voluntary petition for relief in this Court under chapter 11 of the Bankruptcy Code.

6. On February 16, 2023, the Court entered an order (the “**Confirmation Order**”) confirming the *Third Amended Joint Liquidating Chapter 11 Plan of Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) and Its Debtor Affiliates* (the “**Plan**”) [Docket No. 1019].

7. In accordance with the *Notice of Occurrence of Effective Date of Third Amended Joint Liquidating Chapter 11 Plan of Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc. and its Debtor Affiliates* [Docket No. 1082], the effective date of the Plan was March 31, 2023 (the “**Effective Date**”).

8. Pursuant to the Plan and the accompanying Mining Project Wind Down Holdings, Inc. Amended Litigation Trust Agreement [Docket No. 1079, Exhibit F] (the “**Litigation Trust Agreement**”), Tribolet Advisors, LLC was appointed as Litigation Trustee.

9. Since its appointment, the Litigation Trustee has acted within its duties as set forth in the Litigation Trust Agreement, including but not limited to implementing the terms of the Plan as they pertain to the Litigation Trust, maintaining accounts on account of the Litigation Trust, and administering the Causes of Action and Retained Causes of Action as defined in the Plan and the Litigation Trust Agreement.

10. On January 30, 2026, the Litigation Trustee filed the *Litigation Trustee's Motion to Extend the Initial Term of the Mining Project Wind Down Holdings, Inc. Litigation Trust* [Docket No. 1579] (the "**Trust Extension Motion**").

11. As recently described in the Trust Extension Motion, the Litigation Trustee intends to make an interim distribution to creditors, including holders of allowed general unsecured claims³, in the second quarter of 2026.

Requirement to Provide Tax Information

12. Section 6.6 of the Plan provides that, because distributions made pursuant to the Plan are "subject to [] withholding and reporting requirements," the "Debtors, Reorganized Debtors, Distribution Agent, and any applicable withholding agent shall comply with all tax withholding and reporting requirements imposed on them by any Governmental Unit[.]" *Plan, Section 6.6*. To this end, the Plan mandates that "[a]ny person entitled to receive any property as an issuance or distribution under the Plan shall, upon request, deliver to the applicable Distribution Agent, an appropriate Form W-9 or (if the payee is a foreign Person) Form W-8." *Id.* In furtherance of such obligations, the Plan Administrator and Litigation Trustee are "authorized to take all actions necessary or appropriate to comply with [the] withholding and reporting requirements." *Id.*

³ Subject to holdbacks for disputed claims, unless otherwise estimated pursuant to an order of the Bankruptcy Court.

13. Similarly, Section 4.02 of the Litigation Trust Agreement authorizes the Litigation Trustee to conclusively rely on the names, addresses, and tax identification numbers set forth on the Claims Register as of the Distribution Record Date. *See Litigation Trust Agreement, Section 4.02.* It also authorizes the Litigation Trustee to collect the tax information (the “**Tax Information**”):

Each Beneficiary shall furnish, in writing, its name, address, and tax identification number as assigned by the IRS and completed IRS Form W-9 or, if applicable, IRS Form W-8 to the Litigation Trustee within ninety (90) days of a written request from the Litigation Trustee. The Litigation Trustee shall make two (2) such requests.

Id.

14. Importantly, a Beneficiary’s failure to comply with the foregoing obligation results in certain consequences. The Litigation Trust Agreement provides that a Beneficiary will forfeit their Litigation Trust interest and rights to any Distribution if they fail to respond to the Litigation Trustee’s second request for Tax Information within ninety (90) days of the second request, and such forfeited amounts will revert in the Litigation Trust and be distributed to the remaining Beneficiaries on the next Distribution Date. *Id.*

The Litigation Trustee’s Efforts to Obtain Tax Information

15. At the direction of the Litigation Trustee, RPA Advisors (“**RPA**”), as financial advisor to the Litigation Trustee, conducted a process to obtain Tax Information from specific claimants where no Tax Information had been previously found. The population of claimants was identified by reviewing the Estates’ books and records, filed proofs of claim and related Court filings maintained by the Estates’ claims agent, Epiq Corporate Restructuring, LLC (“**Epiq**”).

16. On June 16-18, 2025, letter requests were sent to fifty-one (51) claimants by U.S. mail and email to addresses from the Debtors’ books and records, requesting that such claimants provide Tax Information by June 30, 2025 by completing and returning the IRS forms W-9 or W-

8 attached to the letter request (the “**Initial Request**”). A copy of the form Initial Request, along with a list of the recipients of such Initial Request, is attached hereto as **Exhibit B**.⁴ Thirty-two (32) claimants responded to the Initial Request and provided the requested information.

17. On July 1, 2025, letter requests were sent to the remaining nineteen (19) unresponsive claimants by email to addresses from the Debtors’ books and records, requesting that such claimants provide Tax Information immediately by completing the IRS forms W-9 or W-8 attached to the letter request (the “**Second Request**”). A copy of the form Second Request, along with a list of the recipients of such Second Request, is attached hereto as **Exhibit C**.⁵ Six (6) claimants responded to the Second Request and provided the requested information.

18. On July 9-10, 2025, letter requests were sent to ten (10) remaining unresponsive claimants by email to addresses from the Debtors’ books and records, and the Litigation Trustee made written requests of three (3) remaining unresponsive claimants by email, requesting that such claimants provide Tax Information immediately by completing the IRS forms W-9 or W-8 attached to the letter request (the “**Third Request**”). A copy of the form Third Request, along with a list of the recipients of such Third Request, is attached hereto as **Exhibit D**.⁶ Seven (7) claimants responded to the Third Request and provided the requested information.

19. During the months of August and September 2025, RPA researched alternative contacts and attempted to reach the remaining six (6) unresponsive claimants through emails to

⁴ The Initial Request was mailed to the applicable claimants at the addresses set forth on the list attached hereto as **Exhibit B**, which addresses were derived from either each claimant’s proof of claim or, if no proof of claim was filed, the Debtors’ books and records.

⁵ The Second Request was mailed to the applicable claimants at the addresses set forth on the list attached hereto as **Exhibit C**, which addresses were derived from either each claimant’s proof of claim or, if no proof of claim was filed, the Debtors’ books and records.

⁶ The Third Request was mailed to the applicable claimants at the addresses set forth on the list attached hereto as **Exhibit D**, which addresses were derived from either each claimant’s proof of claim or, if no proof of claim was filed, the Debtors’ books and records.

alternative email addresses found through research and through direct phone calls to identified contacts.

20. Notwithstanding the Litigation Trustee's and RPA's efforts to obtain all of the necessary Tax Information to make an interim distribution under the Plan, as of the date hereof, the Litigation Trustee still has not received Tax Information from six (6) claimants, listed on Schedule 1 to the Proposed Order (collectively, the "**Unresponsive TIN Claimants**").

21. More than ninety (90) days has passed since the Second Request was made. The Litigation Trustee also made a Third Request and undertook the additional efforts described above to obtain the Tax Information from the Unresponsive TIN Claimants.

22. Out of an abundance of caution, the Litigation Trustee files this Motion to enforce Section 4.02 of the Litigation Trust Agreement and to effectuate the forfeiture of the Unresponsive TIN Claimants' Litigation Trust interests and rights to Distributions, thereby affording the Unresponsive TIN Claimants and other parties in interest adequate notice that the Unresponsive TIN Claimants' claims will be disallowed and expunged in their entirety, and not be entitled to receive any distributions in the Chapter 11 Cases, absent such Unresponsive TIN Claimants responding to this Motion or submitting the Tax Information to the Litigation Trustee on or before the hearing on this Motion.⁷ A prompt response is necessary as the Litigation Trustee is required to make a distribution within sixty (60) days of the Litigation Trustee's receipt of certain settlement funds due from the Debtors' former directors and officers, which funds are expected to be received by the Litigation Trustee by the end of April 2026.

⁷ For the avoidance of doubt, neither the receipt of this Motion nor the return of a completed IRS form by any of the Unresponsive TIN Claimants necessarily means that they shall have an allowed claim against the Debtor or that they are entitled to receive a cash distribution from the Debtor on account of such claim. Furthermore, the receipt of a completed IRS form from Touzi Capital LLC does not alter or impair the Court's prior order prohibiting the Litigation Trustee and Plan Administrator from making any payments, distributions or other transfers of funds, cash or assets to Touzi Capital LLC (Docket No. 1494).

Basis for Relief

23. Section 105(a) of the Bankruptcy Code confers upon this Court broad equitable powers to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.” 11 U.S.C. § 105(a); *see also United States v. Sutton*, 786 F.2d 1305, 1308 (5th Cir. 1986) (holding that section 105(a) of the Code authorizes bankruptcy courts to fashion equitable remedies “in a manner consistent with the provisions of the Bankruptcy Code”); *In re Trevino*, 599 B.R. 526, 542–43 (Bankr. S.D. Tex. 2019) (noting that bankruptcy court has “broad authority” under section 105(a) of the Bankruptcy Code).

24. Section 1142(a) of the Bankruptcy Code provides that “any entity organized or to be organized for the purpose of carrying out [a] plan shall carry out the plan and shall comply with any orders of the court.” 11 U.S.C. § 1142(a). Section 1142(b) of the Bankruptcy Code provides the Court expansive power “to direct the debtor and any other necessary party to execute or deliver...any instrument required to effect a transfer of property dealt with by a confirmed plan, and to perform any other act...that is necessary for the consummation of the plan.” 11 U.S.C. § 1142(b).

25. The Plan also explicitly retained broad jurisdiction for the Court over all matters arising out of, or relating to, the Chapter 11 Cases and the Plan, including, among others, jurisdiction to:

- (a) allow, disallow, determine, liquidate, classify, estimate, or establish the priority, secured or unsecured status, or amount of any Claim or Interest, including the resolution of any request for payment of any Administrative Claim and the resolution of any and all objections to the secured or unsecured status, priority, amount, or allowance of Claims or Interests;

- (b) ensure that distributions to holders of Allowed Claims and Allowed Interests (as applicable) are accomplished pursuant to the provisions of the Plan and adjudicate any and all disputes arising from or relating to distributions under the Plan;
- (c) issue injunctions, enter and implement other orders, or take such other actions as may be necessary to restrain interference by any Entity with Consummation or enforcement of the Plan; and
- (d) determine any other matters that may arise in connection with or relate to the Plan, the Plan Supplement, the Disclosure Statement, the Confirmation Order, or any contract, instrument, release, indenture, or other agreement or document created in connection with the Plan or the Disclosure Statement.

See Plan, Sections 12.1.1, 12.1.4, 12.1.10, 12.1.14; Confirmation Order ¶ 131.

26. The Litigation Trustee respectfully requests that the Court exercise its equitable authority and enter the Proposed Order authorizing and directing the Litigation Trustee to accomplish and comply with the terms of the Plan and the Litigation Trust Agreement. The Litigation Trustee has attempted to obtain the missing Tax Information from the Unresponsive TIN Claimants on multiple occasions by using commercially reasonable means. Despite such repeated efforts, the Tax Information remains outstanding, and the Litigation Trustee seeks to enforce its rights under the Litigation Trust Agreement to permit the efficient completion of the wind down of the estates and the Litigation Trust.

27. Accordingly, the Litigation Trustee submits that the relief requested herein is just and appropriate under the circumstances. In fact, numerous courts have granted similar relief to that requested herein. *See, e.g., In re Dean Foods Co.*, Case No. 19-36314 (DRJ) (Bankr. S.D. Tex. 2023) [Docket No. 1214]; *In re Specialty Retail Shops Holding Corp.*, Case No. 19-80064 (TLS)

(Bankr. D. Neb. 2023) [D.I. 2828]; *In re F-Squared Investment Management, LLC*, Case No. 15-11469 (LSS) (Bankr. D. Del. 2022) [Docket No. 1400].

Notice

28. Notice of this Motion has been provided to (a) the U.S. Trustee, (b) each Unresponsive TIN Claimant listed on Schedule 1 to the Proposed Order, and (c) any party that has requested notice pursuant to Bankruptcy Rule 2002. In light of the nature of the relief requested, the Litigation Trustee submits that no other or further notice need be given.

Conclusion

WHEREFORE, the Litigation Trustee respectfully requests that this Court (a) enter the Proposed Order, substantially in the form attached hereto, granting the relief requested herein, and (b) grant such other and further relief as the Court deems just and proper.

Dated: May 1, 2026

ASK LLP

/s/ Jennifer A. Christian
Jennifer A. Christian (admitted *pro hac vice*)
60 East 42nd Street, 46th Floor
New York, NY 10165
Telephone: (212) 267-7342
Email: jchristian@askllp.com

Nicholas C. Brown (admitted *pro hac vice*)
2600 Eagan Woods Drive, Suite 400
St. Paul, MN 55121
Telephone: (651) 289-3846
Facsimile: (651) 406-9676
E-mail: nbrown@askllp.com
Counsel to the Litigation Trustee

EXHIBIT A

Schwendeman Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

MINING PROJECT WIND DOWN HOLDINGS,
INC. (f/k/a Compute North Holdings, Inc.), *et al.*,

Reorganized Debtors.¹

Chapter 11

Case No. 22-90273 (MI)

(Jointly Administered)

**DECLARATION OF JEFFREY SCHWENDEMAN IN SUPPORT
OF MOTION OF LITIGATION TRUSTEE FOR ENTRY OF AN
ORDER DISALLOWING CERTAIN CLAIMS FOR FAILURE
TO FURNISH REQUESTED TAX INFORMATION**

I, Jeffrey Schwendeman, declare as follows:

1. I am a Director with RPA Advisors, LLC (“**RPA Advisors**”), financial advisor to Tribolet Advisors, LLC, in its capacity as Litigation Trustee (the “**Litigation Trustee**”) for the Mining Project Wind Down Holdings, Inc. Litigation Trust (the “**Litigation Trust**”). I submit this declaration (this “**Declaration**”) in support of the *Motion of Litigation Trustee for Entry of an Order Disallowing Certain Claims for Failure to Furnish Requested Tax Information* (the

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“**Motion**”).²

2. Except as otherwise indicated, I have personal knowledge of the matters set forth herein or have obtained such knowledge from the books and records of the Debtors and the Litigation Trustee. If I were called upon to testify, I could and would competently testify to the facts set forth herein.

3. At the direction of the Litigation Trustee, RPA conducted a process to obtain Tax Information from specific claimants where no Tax Information had been previously found. The population of claimants was identified by reviewing the Debtors’ books and records, filed proofs of claim and related Court filings maintained by Epiq.

4. On June 16-18, 2025, RPA caused written letter requests to be sent to fifty-one (51) claimants by U.S. mail and email to addresses from the Debtors’ books and records, requesting that such claimants provide Tax Information by June 30, 2025 by completing and returning the IRS forms W-9 or W-8 attached to the letter request (the “**Initial Request**”). A copy of the form Initial Request, along with a list of the recipients of such Initial Request and their addresses, is attached to the Motion as **Exhibit B**.

5. Thirty-two (32) claimants responded to the Initial Request and provided the requested information.

6. On July 1, 2025, RPA caused written letter requests to be sent to the remaining nineteen (19) unresponsive claimants by email to addresses from the Debtors’ books and records, requesting that such claimants provide Tax Information immediately by completing the IRS forms W-9 or W-8 attached to the letter request (the “**Second Request**”). A copy of the form Second

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion, the Plan or the Litigation Trust Agreement, as applicable.

Request, along with a list of the recipients of such Second Request and their addresses, is attached to the Motion as **Exhibit C**.

7. Six (6) claimants responded to the Second Request and provided the requested information.

8. On July 9-10, 2025, RPA caused written letter requests to be sent to ten (10) remaining unresponsive claimants by email to addresses from the Debtors' books and records, and separately the Litigation Trustee made written requests of three (3) remaining unresponsive claimants by email, requesting that such claimants provide Tax Information immediately by completing the IRS forms W-9 or W-8 attached to the letter request (the "**Third Request**"). A copy of the form Third Request, along with a list of the recipients of such Third Request and their addresses, is attached to the Motion as **Exhibit D**.

9. Seven (7) claimants responded to the Third Request and provided the requested information.

10. During the months of August and September 2025, RPA undertook additional efforts to contact the remaining unresponsive claimants, including researching alternative contact information and making follow-up email and telephone outreach.

11. As of the date hereof, six (6) claimants (the "**Unresponsive TIN Claimants**"), identified on Schedule 1 to the Proposed Order, have not provided the requested Tax Information.

12. More than ninety (90) days have elapsed since the Second Request was sent to each of the Unresponsive TIN Claimants.

13. Based on the foregoing, the Unresponsive TIN Claimants have failed to comply with Section 4.02 of the Litigation Trust Agreement.

14. The Litigation Trustee is preparing to make an interim distribution and requires

complete tax information to comply with applicable withholding and reporting obligations.

15. The failure of the Unresponsive TIN Claimants to provide required Tax Information prevents the efficient administration of the Litigation Trust and delays distributions to other Beneficiaries.

16. The relief requested in the Motion is necessary to enforce the terms of the Litigation Trust Agreement and to permit the orderly administration of the Litigation Trust and the making of distributions to other Beneficiaries.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 1, 2026

/s/ Jeffrey Schwendeman
Jeffrey Schwendeman
RPA Advisors

EXHIBIT B – INITIAL REQUEST



RPA Advisors, LLC
45 Eisenhower Drive
Paramus, NJ 07652
Tel: 201-527-6660
Fax: 201-527-6620

June 16, 2025

Sent via Electronic Mail

Dear Claimant:

Re: Request for IRS Form

**In re MINING PROJECT WIND DOWN HOLDINGS (f/k/a Compute North Holdings, Inc.), et.al.
United States Bankruptcy Court for the Southern District of Texas Houston Division
Case No. 22-90273 (MI)**

On February 16, 2023 the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the "Bankruptcy Court") entered an order confirming the Debtors' Joint Chapter 11 Plan (the "Plan"), which became effective on March 31, 2023. Under the Plan, Michael Tribolet as Plan Administrator became the sole manager, director and officer of the reorganized debtors. The Plan Administrator will authorize any distributions to holders of allowed claims pursuant to the Plan. RPA Advisors, LLC ("RPA") will be assisting the Plan Administrator in the processing of distributions under the Plan.

In order to comply with applicable law and before the Plan Administrator can authorize a distribution to which you may be entitled, you must complete and return the attached IRS Form W8 to RPA immediately and in no event later than June 30, 2025. Please forward the W8 Form to either of the following addresses:

If by hand delivery, overnight mail or First-Class mail:
MINING PROJECT WIND DOWN HOLDINGS (f/k/a Compute North Holdings, Inc.), et.al. - W8
Request Form
c/o RPA Advisors, LLC – Attn: Jaclyn Hill
45 Eisenhower Drive, Suite 560
Paramus, NJ 07652

If electronically:
Subject - MINING PROJECT WIND DOWN HOLDINGS (f/k/a Compute North Holdings, Inc.),
et.al. - W8 Request Form
To: jhill@rpaadvisors.com

PLEASE TAKE NOTICE THAT YOUR FAILURE TO PROVIDE A COMPLETED W8 THAT INCLUDES YOUR TAXPAYER IDENTIFICATION NUMBER OR SOCIAL SECURITY NUMBER, AS APPLICABLE, MAY RESULT IN THE LOSS OF ANY RIGHT YOU MAY HAVE TO RECEIVE FUTURE DISTRIBUTIONS ON ACCOUNT OF YOUR ALLOWED CLAIM AGAINST THE DEBTORS' ESTATES.

For any questions regarding this request, please contact Jeff Schwendeman of RPA via e-mail at jschwendeman@rpaadvisors.com, or via telephone at 201-527-6661.

Please be advised that neither your receipt of this letter nor your return of a completed IRS Form necessarily means that you have an allowed claim against the Debtor or that you are entitled to receive a cash distribution from the Debtor on account of such claim.

Thank you for your assistance.

Very truly yours,
RPA Advisors, LLC

COMPANY/CLAIM NAME	ATTENTION	ADDRESS1	CITY	STATE	ZIP	COUNTRY
858 CONSULTING LLC	ATTN: TAX DEPARTMENT	PO BOX 1811	RANCHO SANTA FE	CA	92067	
ARGO PARTNERS	TRANSFEROR: FLEXENTIAL LLC	12 WEST 37TH ST, STE 900	NEW YORK	NY	10018	
ASM CAPITAL X LLC : ATTN: ADAM MOSKOWITZ	TRANSFEROR: ECHO SEARCH GROUP	100 JERICHO QUADRANGLE, STE 230	JERICHO	NY	11753	
AUTHENTIC BRAND	ATTN: TAX DEPARTMENT	4600 W 77TH ST, STE 385	MINNEAPOLIS	MN	55435	
BITNILE INC	ATTN: TAX DEPARTMENT	11411 SOUTHERN HIGHLANDS PKWY, STE 240	LAS VEGAS	NV	89141	
BLOCKMETRIX	C/O SIDLEY AUSTIN LLP : MAEGAN QUEJADA	1000 LOUISIANA ST, STE 5900	HOUSTON	TX	77002	
BOBS LIMITED	ATTN: TAX DEPARTMENT	2401 SASKATCHEWAN DR	REGINA	SK	S4P 4H8	CANADA
BOLDA, MATTHIAS	ATTN: TAX DEPARTMENT	6178 E BAJA DR	ANAHEIM	CA	92807-4037	
BRADFORD CAPITAL HOLDINGS, LP : TRANSFEROR: HARVEY, EDWARD DRAKE III	ATTN: B BRAGER	PO BOX 4353	CLIFTON	NJ	07012	
BRADFORD CAPITAL HOLDINGS, LP : TRANSFEROR: KITTILSTVED, BRETT	ATTN: B BRAGER	PO BOX 4353	CLIFTON	NJ	07012	
BRADFORD CAPITAL HOLDINGS, LP : TRANSFEROR: MOVIUS, DAVID T	ATTN: B BRAGER	PO BOX 4353	CLIFTON	NJ	07012	
BRADFORD CAPITAL HOLDINGS, LP : TRANSFEROR: SUNBELT SOLOMON SERVICES LLC	ATTN: B BRAGER	PO BOX 4353	CLIFTON	NJ	07012	
BRADFORD CAPITAL HOLDINGS, LP : TRANSFEROR: URBAN SOLUTION GROUP LLC	ATTN: B BRAGER	PO BOX 4353	CLIFTON	NJ	07012	
CH ROBINSON WORLDWIDE INC	ATTN: TAX DEPARTMENT	14701 CHARLSON RD	EDEN PRAIRIE	MN	55347	
CNA COMMERCIAL INSURANCE	ATTN: TAX DEPARTMENT	500 COLONIAL CENTER PKWY	LAKE MARY	FL	32746	
COFFMAN ENGINEERS INC	ATTN: TAX DEPARTMENT	1101 SECOND AVE, STE 400	SEATTLE	WA	98101	
COMMONWEALTH ELECTRIC CO OF THE MIDWEST	ATTN BILLY J FRIESEN, CFO	3910 SOUTH ST	LINCOLN	NE	68506	
CRG FINANCIAL LLC	TRANSFEROR: ALDER SPV I LLC	84 HERBERT AVE, BUILDING B, SUITE 202	CLOSTER	NJ	07624	
CULVER VENTURES LLC	ATTN: TAX DEPARTMENT	5830 E 2ND ST, STE 7000-3771	CASPER	WY	82609	
DAVIS POLK & WARDWELL LLP	ATTN BRIAN M RESNICK	450 LEXINGTON AVE	NEW YORK	NY	10017	
DE LETONA, SIRIA CORBETTA LOPEZ	ATTN: TAX DEPARTMENT	SCHILLER 256, INT 402	CDMX 11560			MEXICO
DECIMAL DIGITAL CURRENCY I LLC	ATTN: TAX DEPARTMENT	153 VALLEY ST, STE 26	SOUTH ORANGE	NJ	07079	
FIRST SCRIBE INC	ATTN: TAX DEPARTMENT	110 CHESHIRE LN, STE 105	MINNETONKA	MN	55305-1009	
FOX MINING COMPANY LLC	ATTN MARK FOX	1028 S DOGWOOD DR	HARRISONBURG	VA	22801	
GEM MINING 1 LLC	C/O FROST BROWN TODD LLC : ATTN A J WEBB	301 E 4TH ST, STE 3300	CINCINNATI	OH	45202	
HASH CASH MINING LLC	ATTN: TAX DEPARTMENT	30 6TH AVE N	HOPKINA	MN	55343	
HAYLO GROUP	ATTN: TAX DEPARTMENT	701 TILLERY ST, #12, UNIT 100	AUSTIN	TX	78702	
HSI WORKPLACE COMPLIANCE SOLUTIONS INC	ATTN: TAX DEPARTMENT	PO BOX 809321	CHICAGO	IL	60680-9321	
INSPERITY PEO SERVICES LP	C/O GREENBERG TRAUIG LLP : ATTN KARL D BURRER	1000 LOUISIANA ST, STE 6700	HOUSTON	TX	77002	
LP1 LLC : TRANSFEROR: RK MISSION CRITICAL LLC	C/O KLEINBERG, KAPLAN, WOLFF & COHEN PC : MARTIN SKLAR	500 FIFTH AVENUE	NEW YORK	NY	10110	
LUJAN PA FINANCIAL LLC	ATTN EZEQUIEL LUJAN	717 MARKET ST, STE 268	LEMOYNE	PA	17043	
MIDAMERICAN ENERGY COMPANY	ATTN CREDIT	PO BOX 4350	DAVENPORT	IA	52808-4350	
MILLER & ASSOCIATES CONSULTING ENGINEERS	ATTN: TAX DEPARTMENT	PO BOX 306	KEARNEY	NE	68848	
NBTC LIMITED	ATTN: TAX DEPARTMENT	RM 1502 HARCOURT HOUSE #39 GLOUCESTER RD	WANCHAI, HONG KONG			CHINA
NRG STREAM	ATTN: TAX DEPARTMENT	401 9 AVE SW, STE 865	CALGARY	AB	T2P 3C5	CANADA
OMNIFIC VENTURES INC	ATTN: TAX DEPARTMENT	701 TILLERY ST, #12, UNIT 108	AUSTIN	TX	78702	
POWER ASSET RECOVERY CORPORATION	ATTN: TAX DEPARTMENT	4321 STRAUSSER ST NW	NORTH CANTON	OH	44720	
RANGER GUARD & INVESTIGATIONS	ATTN: TAX DEPARTMENT	4660 BEECHNUT ST, STE 200	HOUSTON	TX	77096	
RECRUITERS OF MINNESOTA INC	ATTN: TAX DEPARTMENT	6110 BLUE CRICLE DR, STE 280	MINNETONKA	MN	55343	
ROEBUCK STAFFING COMPANY LLC	ATTN: TAX DEPARTMENT	300 E ARLINGTON BLVD, STE 3A	GREENVILLE	NC	27858	
SIGN PRO	ATTN: TAX DEPARTMENT	5250 W 74TH ST, STE 21	EDINA	MN	55439-2229	
SPHERE 3D CORP	ATTN: TAX DEPARTMENT	623 STEAMBOAT RD	GREENWICH	CT	06830-7140	
TEAGUE NALL & PERKINS INC	ATTN JEFF SEARS	3200 S INTERSTATE 35E, STE 1129	DENTON	TX	76210	
TOUZI CAPITAL LLC	C/O MOORE & VAN ALLEN PLLC	100 N TRYON ST, STE 4700	CHARLOTTE	NC	28202-4003	
TWC FINANCIAL LLC	ATTN: TAX DEPARTMENT	701 TILLERY ST, STE 12, UNIT 99	AUSTIN	TX	78702	
ULUCK TECHNOLOGY PTE LTD	ATTN ADAM SWICK	500 W 5TH ST, STE 1210	AUSTIN	TX	78701	
US DIGITAL MINING TEXAS LLC	C/O STICHTER RIEDEL BLAIN & POSTLER PA : ATTN SCOTT A STICHTER	110 E MADISON ST, STE 200	TAMPA	FL	33602	
VALUE CHAIN VENTURES	ATTN: TAX DEPARTMENT	1540 BROADWAY, STE 1010	NEW YORK	NY	10036	
VERIBI LLC	C/O HOFFMAN & SAWERIS PC	2777 ALLEN PKWY, STE 1000	HOUSTON	TX	77019	
WAND CORPORATION	ATTN SPENCER BARRON	7575 CORPORATE WAY	EDEN PRAIRIE	MN	55344	
WEIDNER & PHILIPPS LTD	D/B/A OVERHEAD DOOR OF THE PERMIAN BASIN	PO BOX 2932	MIDLAND	TX	79702	

EXHIBIT C – SECOND REQUEST



RPA Advisors, LLC
45 Eisenhower Drive
Paramus, NJ 07652
Tel: 201-527-6660
Fax: 201-527-6620

June 16, 2025

Sent via Electronic Mail

Dear Claimant:

Re: Request for IRS Form

**In re MINING PROJECT WIND DOWN HOLDINGS (f/k/a Compute North Holdings, Inc.), et.al.
United States Bankruptcy Court for the Southern District of Texas Houston Division
Case No. 22-90273 (MI)**

On February 16, 2023 the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the "Bankruptcy Court") entered an order confirming the Debtors' Joint Chapter 11 Plan (the "Plan"), which became effective on March 31, 2023. Under the Plan, Michael Tribolet as Plan Administrator became the sole manager, director and officer of the reorganized debtors. The Plan Administrator will authorize any distributions to holders of allowed claims pursuant to the Plan. RPA Advisors, LLC ("RPA") will be assisting the Plan Administrator in the processing of distributions under the Plan.

In order to comply with applicable law and before the Plan Administrator can authorize a distribution to which you may be entitled, you must complete and return the attached IRS Form W8 to RPA immediately and in no event later than June 30, 2025. Please forward the W8 Form to either of the following addresses:

If by hand delivery, overnight mail or First-Class mail:
MINING PROJECT WIND DOWN HOLDINGS (f/k/a Compute North Holdings, Inc.), et.al. - W8
Request Form
c/o RPA Advisors, LLC – Attn: Jaclyn Hill
45 Eisenhower Drive, Suite 560
Paramus, NJ 07652

If electronically:
Subject - MINING PROJECT WIND DOWN HOLDINGS (f/k/a Compute North Holdings, Inc.),
et.al. - W8 Request Form
To: jhill@rpaadvisors.com

PLEASE TAKE NOTICE THAT YOUR FAILURE TO PROVIDE A COMPLETED W8 THAT INCLUDES YOUR TAXPAYER IDENTIFICATION NUMBER OR SOCIAL SECURITY NUMBER, AS APPLICABLE, MAY RESULT IN THE LOSS OF ANY RIGHT YOU MAY HAVE TO RECEIVE FUTURE DISTRIBUTIONS ON ACCOUNT OF YOUR ALLOWED CLAIM AGAINST THE DEBTORS' ESTATES.

For any questions regarding this request, please contact Jeff Schwendeman of RPA via e-mail at jschwendeman@rpaadvisors.com, or via telephone at 201-527-6661.

Please be advised that neither your receipt of this letter nor your return of a completed IRS Form necessarily means that you have an allowed claim against the Debtor or that you are entitled to receive a cash distribution from the Debtor on account of such claim.

Thank you for your assistance.

Very truly yours,
RPA Advisors, LLC

COMPANY/CLAIM NAME	OFF EMAIL	HOME EMAIL
858 CONSULTING LLC	BRYANHERTZ@GMAIL.COM	
BITNILE INC	DARREN@AULT.COM	
BOBS LIMITED	NCOVILL@MERCHANTLAW.COM	
BOLDA, MATTHIAS	MATCE@GMX.AT	
CNA COMMERCIAL INSURANCE	CYNTHIA.GORAL@CNA.COM	
DAVIS POLK & WARDWELL LLP	CNNOTICES@DAVISPOLK.COM	
DE LETONA, SIRA CORBETTA LOPEZ	SIRACORBETTA@GMAIL.COM	
DECIMAL DIGITAL CURRENCY I LLC	ROSHAN@DECIMALGROUP.IO	MSILVERMAN@PRYORCASHMAN.COM
FOX MINING COMPANY LLC	FOXMINING7@GMAIL.COM	
GEM MINING 1 LLC	AWEBB@FBTLAW.COM	
INSPERITY PEO SERVICES LP	BURRERK@GTLAW.COM	
LUJAN PA FINANCIAL LLC	LUJAN.PA.FINANCIAL@GMAIL.COM	
MILLER & ASSOCIATES CONSULTING ENGINEERS	RMILLER@MILLER-ENGINEERS.COM	
NRG STREAM	ACCOUNTS@NRGSTREAM.COM	
RECRUITERS OF MINNESOTA INC	KELLY@RECRUITERSOFMN.COM	
SIGN PRO	JBIANCO@SIGNPROWG.COM	
TOUZI CAPITAL LLC	LATOSZ@MVALAW.COM	
VALUE CHAIN VENTURES	MATT.FEAST@VCVDIGITAL.COM	
WEIDNER & PHILIPPS LTD	BDOWEIDNER@SBCGLOBAL.NET	OVERHEADDOOR1@SBCGLOBAL.NET

EXHIBIT D – THIRD REQUEST

Request from RPA Advisors:



RPA Advisors, LLC
45 Eisenhower Drive
Paramus, NJ 07652
Tel: 201-527-6660
Fax: 201-527-6620

June 16, 2025

Sent via Electronic Mail

Dear Claimant:

Re: Request for IRS Form

In re MINING PROJECT WIND DOWN HOLDINGS (f/k/a Compute North Holdings, Inc.), et.al.
United States Bankruptcy Court for the Southern District of Texas Houston Division
Case No. 22-90273 (MI)

On February 16, 2023 the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the "Bankruptcy Court") entered an order confirming the Debtors' Joint Chapter 11 Plan (the "Plan"), which became effective on March 31, 2023. Under the Plan, Michael Tribolet as Plan Administrator became the sole manager, director and officer of the reorganized debtors. The Plan Administrator will authorize any distributions to holders of allowed claims pursuant to the Plan. RPA Advisors, LLC ("RPA") will be assisting the Plan Administrator in the processing of distributions under the Plan.

In order to comply with applicable law and before the Plan Administrator can authorize a distribution to which you may be entitled, you must complete and return the attached IRS Form W8 to RPA immediately and in no event later than June 30, 2025. Please forward the W8 Form to either of the following addresses:

If by hand delivery, overnight mail or First-Class mail:
MINING PROJECT WIND DOWN HOLDINGS (f/k/a Compute North Holdings, Inc.), et.al. - W8
Request Form
c/o RPA Advisors, LLC – Attn: Jaclyn Hill
45 Eisenhower Drive, Suite 560
Paramus, NJ 07652

If electronically:
Subject - MINING PROJECT WIND DOWN HOLDINGS (f/k/a Compute North Holdings, Inc.),
et.al. - W8 Request Form
To: jhill@rpaadvisors.com

PLEASE TAKE NOTICE THAT YOUR FAILURE TO PROVIDE A COMPLETED W8 THAT INCLUDES YOUR TAXPAYER IDENTIFICATION NUMBER OR SOCIAL SECURITY NUMBER, AS APPLICABLE, MAY RESULT IN THE LOSS OF ANY RIGHT YOU MAY HAVE TO RECEIVE FUTURE DISTRIBUTIONS ON ACCOUNT OF YOUR ALLOWED CLAIM AGAINST THE DEBTORS' ESTATES.

For any questions regarding this request, please contact Jeff Schwendeman of RPA via e-mail at jschwendeman@rpaadvisors.com, or via telephone at 201-527-6661.

Please be advised that neither your receipt of this letter nor your return of a completed IRS Form necessarily means that you have an allowed claim against the Debtor or that you are entitled to receive a cash distribution from the Debtor on account of such claim.

Thank you for your assistance.

Very truly yours,
RPA Advisors, LLC

COMPANY/CLAIM NAME	OFFICE EMAIL	HOME EMAIL
CNA COMMERCIAL INSURANCE	CYNTHIA.GORAL@CNA.COM	
DAVIS POLK & WARDWELL LLP	CNNOTICES@DAVISPOLK.COM	
FOX MINING COMPANY LLC	FOXMINING7@GMAIL.COM	
GEM MINING 1 LLC	AWEBB@FBTLAW.COM	
LUJAN PA FINANCIAL LLC	LUJAN.PA.FINANCIAL@GMAIL.COM	
MILLER & ASSOCIATES CONSULTING ENGINEERS	RMILLER@MILLER-ENGINEERS.COM	
TOUZI CAPITAL LLC	LATOSZ@MVALAW.COM	
VALUE CHAIN VENTURES	MATT.FEAST@VCVDIGITAL.COM	
WEIDNER & PHILIPPS LTD	BDOWEIDNER@SBCGLOBAL.NET	OVERHEADDOOR1@SBCGLOBAL.NET

Request from Plan Administrator:

COMPANY/CLAIM NAME	OFFICE EMAIL
BOBS LIMITED	NCOVILL@MERCHANTLAW.COM
DE LETONA, SIRA CORBETTA LOPEZ	SIRACORBETTA@GMAIL.COM
NRG STREAM	ACCOUNTS@NRGSTREAM.COM

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

MINING PROJECT WIND DOWN HOLDINGS,
INC. (f/k/a Compute North Holdings, Inc.), *et al.*,

Reorganized Debtors.¹

Chapter 11

Case No. 22-90273 (MI)

(Jointly Administered)

**ORDER AUTHORIZING THE DISALLOWANCE OF CERTAIN CLAIMS
FOR FAILURE TO FURNISH REQUESTED TAX INFORMATION**

Upon consideration of the *Motion of Litigation Trustee for Entry of an Order Disallowing Certain Claims for Failure to Furnish Requested Tax Information* (the “**Motion**”)² filed by Tribolet Advisors, LLC, as Litigation Trustee (the “**Litigation Trustee**”) for entry of an order disallowing claims held by Unresponsive TIN Claimants and enforcing the forfeiture of such claimants’ Litigation Trust interests and rights to any Distribution for failure to timely furnish Tax Information in accordance with Section 4.02 of the Litigation Trust Agreement; and the Court

¹ The Reorganized Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, include: Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) (4534); Mining Project Wind Down LLC (f/k/a Compute North LLC) (7185); Mining Project Wind Down Corpus Christi LLC (f/k/a CN Corpus Christi LLC) (5551); Mining Project Wind Down Atoka LLC (f/k/a CN Atoka LLC) (4384); Mining Project Wind Down BS LLC (f/k/a CN Big Spring LLC) (4397); Mining Project Wind Down Colorado Bend LLC (f/k/a CN Colorado Bend LLC) (4610); Mining Project Wind Down Developments LLC (f/k/a CN Developments LLC) (2570); Mining Project Wind Down Equipment LLC (f/k/a CN Equipment LLC) (6885); Mining Project Wind Down King Mountain LLC (f/k/a CN King Mountain LLC) (7190); Mining Project Wind Down MDN LLC (f/k/a CN Minden LLC) (3722); Mining Project Wind Down Mining LLC (f/k/a CN Mining LLC) (5223); Mining Project Wind Down Pledgor LLC (f/k/a CN Pledgor LLC) (9871); Mining Project Wind Down Member LLC (f/k/a Compute North Member LLC) (8639); Mining Project Wind Down NC08 LLC (f/k/a Compute North NC08 LLC) (8069); Mining Project Wind Down NY09 LLC (f/k/a Compute North NY09 LLC) (5453); Mining Project Wind Down STHDAK LLC (f/k/a Compute North SD, LLC) (1501); Mining Project Wind Down Texas LLC (f/k/a Compute North Texas LLC) (1883); Mining Project Wind Down TX06 LLC (f/k/a Compute North TX06 LLC) (5921); and Mining Project Wind Down TX10 LLC (f/k/a Compute North TX10 LLC) (4238). The Debtors’ service address for the purposes of these chapter 11 cases is 2305A Elmen Street, Houston, TX 77019.

² All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

having jurisdiction to consider the matters raised in the Motion pursuant to 28 U.S.C. § 1334 and the Order of Reference to Bankruptcy Judges, General Order 2012-6 (S.D. Tex. May 24, 2012) (Hinjosa, C.J.); and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157; and the Court having found that it may enter a final order consistent with Article III of the United States Constitution; and the 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 opportunity for objection to and a hearing on the Motion having been given to the parties listed therein, and it appearing that no other or further notice is required under the circumstances; and the Court having reviewed and considered the Motion and the Schwendeman Declaration; and the Court having determined that the legal and factual bases set forth in the Motion and the Schwendeman Declaration and at the hearing (if any) establish just cause for the relief granted herein; and the Court having found that the relief set forth in the Motion is in the best interests of the estate, creditors, and other parties in interest, is warranted under the facts and circumstances, and is necessary to facilitate or complete the wind down of the estates and the Litigation Trust; and upon all of the proceedings had before the Court; and all objections to the Motion, if any, having been withdrawn, resolved, or overruled; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED AS FOLLOWS:

1. The Motion and the relief requested therein is granted and approved as set forth herein.
2. Notice of the Motion was fair and equitable under the circumstances and complied in all respects with section 102(1) of the Bankruptcy Code and Bankruptcy Rules 2002 and 6004.

3. Each Unresponsive TIN Claimant listed on **Schedule 1** hereto, has failed to furnish required Tax Information within the time required under Section 4.02 of the Litigation Trust Agreement.

4. Pursuant to Section 4.02 of the Litigation Trust Agreement, each Unresponsive TIN Claimant is deemed to have forfeited its Litigation Trust interest and rights to any Distribution.

5. The claims and associated Litigation Trust interest of the Unresponsive TIN Claimants are hereby disallowed and expunged.

6. Any amounts otherwise distributable to the Unresponsive TIN Claimants shall revert in the Litigation Trust.

7. The Litigation Trustee is authorized to redistribute such amounts to the remaining Beneficiaries on the next Distribution Date in accordance with the Plan and the Litigation Trust Agreement.

8. Notwithstanding anything to the contrary in the Motion, this Order, or the Litigation Trust Agreement, nothing herein shall limit the Litigation Trustee's ability to comply with applicable tax withholding and reporting requirements.

9. Epiq is authorized and directed to expunge the Unresponsive TIN Claimants' claims from the claims register maintained in the Chapter 11 Cases to reflect the relief granted in this Order.

10. The Litigation Trustee and Epiq are authorized to take any and all actions necessary or appropriate to implement and effectuate the terms of, and the relief granted in, this Order without seeking further order of the Court.

11. Notwithstanding Bankruptcy Rules 6004 and 7062 and any other applicable Bankruptcy Rules or applicable Local Rules to the contrary, this Order shall be effective

immediately upon entry and shall not be subject to any stay in the implementation, enforcement, or realization of the relief granted herein. Any stay of this Order is expressly waived.

12. The Court shall retain exclusive jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: Houston, Texas
_____, 2026

UNITED STATES BANKRUPTCY JUDGE

SCHEDULE 1 – UNRESPONSIVE TIN CLAIMANTS³

COMPANY/CLAIM NAME	CLAIM NUMBER	AMOUNT
BOBS LIMITED	14	\$ 193,500.00
DE LETONA, SIRA CORBETTA LOPEZ	10010	\$ 11,696.67
FOX MINING COMPANY LLC	10081	\$ 3,461.25
GEM MINING 1 LLC	10115	\$ 1,800,000.00
TOUZI CAPITAL LLC	10023	\$ 3,329,181.46
VALUE CHAIN VENTURES	10150	\$ 333,333.00

³ For the avoidance of doubt, neither the receipt of this Motion nor the return of a completed IRS form by any of the Unresponsive TIN Claimants necessarily means that they shall have an allowed claim against the Debtor or that they are entitled to receive a cash distribution from the Debtor on account of such claim. Furthermore, the receipt of a completed IRS form from Touzi Capital LLC does not alter or impair the Court's prior order prohibiting the Litigation Trustee and Plan Administrator from making any payments, distributions or other transfers of funds, cash or assets to Touzi Capital LLC (Docket No. 1494).