IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:)
) Chapter 11
PLASTIQ INC., et al., ¹)
) Case No. 23-10671 (BLS)
Debtors.)
) (Joint Administration Requested)

DEBTORS' THIRD OMNIBUS MOTION FOR ENTRY OF ORDER AUTHORIZING REJECTION OF CERTAIN EXECUTORY CONTRACTS, EFFECTIVE AS OF THE PETITION DATE

EACH CONTRACT COUNTERPARTY RECEIVING THIS MOTION SHOULD LOCATE THEIR RESPECTIVE NAMES AND CONTRACT DESCRIPTION IN THE SCHEDULE ATTACHED TO THE PROPOSED ORDER AS SCHEDULE 1.

The above-captioned debtors and debtors in possession (collectively, the "**Debtors**") hereby submit this motion (this "**Motion**") for the entry of an order, substantially in the form attached hereto as Exhibit A (the "Proposed Order"), pursuant to sections 105(a) and 365(a) of title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (the "Bankruptcy Code"), authorizing the Debtors to reject certain executory contracts as set forth on Schedule 1 to the Proposed Order, effective as of the Petition Date. In support of this Motion, the Debtors rely upon and incorporate by reference the Declaration of Vladimir Kasparov in Support of Chapter 11 Petitions and First Day Pleadings (the "First Day Declaration"), filed contemporaneously herewith. In further support of this Motion, the Debtors respectfully state as follows:

Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the First Day Declaration.



The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Plastiq Inc. (6125), PLV Inc. d/b/a/ PLV TX Branch Inc. (5084), and Nearside Business Corp. (N/A). The corporate headquarters and the mailing address for the Debtors is 1475 Folsom Street, Suite 400, San Francisco, California 94103.

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of Delaware (the "Court") has jurisdiction over these chapter 11 cases and this Motion pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012 (the "Amended Standing Order"). This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and the Court may enter a final order consistent with Article III of the United States Constitution. Venue is proper in the Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory and legal predicates for the relief sought herein are sections 105(a) and 365 of the Bankruptcy Code and Rule 6006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

BACKGROUND

I. General

- 2. On the date hereof (the "**Petition Date**"), each of the Debtors commenced a voluntary case under chapter 11 of the Bankruptcy Code. The Debtors are authorized to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No official committees have been appointed in these chapter 11 cases and no request has been made for the appointment of a trustee or examiner.
- 3. Additional information regarding the Debtors' business, their capital structure, and the circumstances leading to the filing of these chapter 11 cases is set forth in the First Day Declaration.

II. The Rejected Executory Contracts

4. Prior to the Petition Date, the Debtors and their advisors reviewed the Debtors' executory contracts, and determined that certain licensing, service, vendor, and other agreements are no longer necessary to the operation of the Debtors' businesses, and therefore do

not further the Debtors' goals of maximizing value for all creditors and stakeholders and minimizing costs in these chapter 11 cases. As set forth more fully in the First Day Declaration, in September of 2022, the Debtors completed an acquisition for Nearside Business Corp. and certain of its subsidiaries ("Nearside"). The Debtors acquired Nearside primarily for its technology and the ability to offer business bank accounts to customers. Subsequent to the acquisition, however, the Debtors discovered that Nearside lacked the technology, security, and controls to sell into the Debtors' customer base. Given the gaps in the technology and the cost/time it would take to achieve commercial feasibility, the Debtors ultimately made the decision to completely shut down the Nearside business in November of 2022.

5. <u>Schedule 1</u> to the Proposed Order contains certain executory contracts related to the acquisition or operation of the Nearside business (collectively, including any amendments or modifications thereto, the "<u>Contracts</u>"). Since the Contracts are no longer utilized by the Debtors, the Debtors determined, in an exercise of their business judgment, to immediately reject the Contracts to avoid potentially incurring further costs and expenses that would only undermine the Debtors' efforts to minimize costs and maximize value of the estate for the benefit of all creditors.

RELIEF REQUESTED

- 6. By this Motion, to preserve and maximize the value of their estates, the Debtors, in an exercise of their business judgment, seek to reject the Contracts, effective as of the Petition Date.
- 7. Section 365(a) of the Bankruptcy Code provides, in pertinent part, that a debtor-in-possession "subject to the court's approval, may assume or reject any executory contract or unexpired lease of the debtor." 11 U.S.C. § 365(a). As courts have held, "[t]he purpose behind allowing the assumption or rejection of executory contracts is to permit the trustee or debtor-in-

property." *Orion Pictures Corp. v. Showtime Networks, Inc.* (*In re Orion Pictures Corp.*), 4 F.3d 1095, 1098 (2d Cir. 1993) (quoting 2 *Collier on Bankruptcy* ¶ 365.01[1] (15th ed. 1993)).

- lease or executory contract should be authorized is the "business judgment" standard. *Sharon Steel Corp. v. Nat'l Fuel Gas Distr. Corp.*, 872 F.2d 36, 40 (3d Cir. 1989); *In re HQ Global Holdings, Inc.*, 290 B.R. 507, 511 (Bankr. D. Del. 2003) (stating that a debtor's decision to reject an executory contract is governed by the business judgment standard and can only be overturned if the decision was the "product of bad faith, whim, or caprice"); *see also In re Tayfur*, 599 F. App'x 44, 49–50 (3d Cir. 2015) (extending the standard articulated in *Sharon Steel* to unexpired leases). Once a debtor states a valid business justification, "[t]he business judgment rule 'is a presumption that in making a business decision the directors of a corporation acted on an informed basis, in good faith and in the honest belief that the action taken was in the best interests of the company." *Official Comm. of Subordinated Bondholders v. Integrated Res., Inc.* (*In re Integrated Res., Inc.*), 147 B.R. 650, 656 (Bankr. S.D.N.Y. 1992) (quoting *Smith v. Van Gorkom*, 488 A.2d 858, 872 (Del. 1985)).
- 9. The business judgment rule is crucial in chapter 11 cases and shields a debtor's management from judicial second-guessing. See Comm. of Asbestos Related Litigants and/or Creditors v. Johns-Manville Corp., 60 B.R. 612, 615–16 (Bankr. S.D.N.Y. 1986) ("The Code favors the continued operation of a business by a debtor and a presumption of reasonableness attached to a debtor's management decisions."). Generally, courts defer to a debtor-in-possession's business judgment to reject a lease or an executory contract. See, e.g., NLRB v. Bildisco & Bildisco, 465 U.S. 513, 523 (1984), superseded by statute on other grounds,

Bankruptcy Amendments and Federal Judgeship Act of 1984, sec. 541, § 1113, Pub. L. No. 98-353, 98 Stat. 333 (codified at 11 U.S.C. § 1113); *In re Minges*, 602 F.2d 38, 43 (2d Cir. 1979); *In re Riodizio*, 204 B.R. 417, 424–25 (Bankr. S.D.N.Y. 1997); *In re G Survivor Corp.*, 171 B.R. 755, 757 (Bankr. S.D.N.Y. 1994).

- 10. Upon finding that the Debtors have exercised their sound business judgment in determining that the rejection of the Contracts is in the best interests of the Debtors and their estates, the Court should approve the proposed rejections under section 365(a) of the Bankruptcy Code. See, e.g., Westbury Real Estate Ventures, Inc. v. Bradlees, Inc. (In re Bradlees Stores, Inc.), 194 B.R. 555, 558 n.1 (Bankr. S.D.N.Y. 1996); Summit Land Co. v. Allen (In re Summit Land Co.), 13 B.R. 310, 315 (Bankr. D. Utah 1981) (holding that, absent extraordinary circumstances, court approval of a debtor's decision to assume or reject an executory contract "should be granted as a matter of course"). If a debtor's business judgment has been reasonably exercised, a court should approve the assumption or rejection of an unexpired lease or executory contract. See, e.g., Sharon Steel Corp., 872 F.2d at 39–40.
- 11. Following the acquisition of Nearside in September of 2022, the Debtors discovered that Nearside lacked the necessary technology, security, and controls to sell into the Debtors' customer base. Due to the time and cost needed to make Nearside commercially feasible, the decision was made to shut down Nearside in November 2022. The Debtors have therefore determined that the Contracts are not integral to the Debtors' chapter 11 efforts, are not otherwise beneficial to the Debtors' estates, and may present burdensome contingent liabilities. Accordingly, the Debtors' decision to reject the Contracts is an exercise of sound business judgment, and therefore should be approved.

- determined that such agreements do not provide the Debtors with any material benefit, and should be immediately rejected to cut off the potential incurrence of additional administrative cost or expense. The facts and circumstances of the chapter 11 cases and the balance of the equities favor the Debtors' rejection of the Contracts effective as of the Petition Date. Without a retroactive date of rejection, the Debtors may incur unnecessary administrative charges related to the legacy contracts of a business no longer in operation. Moreover, the counterparties to the Contracts will not be unduly prejudiced if the Contracts are rejected effective as of the Petition Date because the Debtors will serve this Motion on each counterparty or its agent or representative by electronic mail and/or first class mail, stating that the Debtors intend to reject the Contracts.
- 13. In light of the foregoing facts and circumstances, the Debtors respectfully submit that their rejection of the Contracts under section 365 of the Bankruptcy Code, effective as of the Petition Date, is a sound exercise of their business judgment, and is necessary, prudent, and in the best interests of the Debtors, their estates, and their creditors. Accordingly, entry of the Proposed Order is appropriate.

RESERVATION OF RIGHTS

14. Nothing in the Proposed Orders of this Motion: (a) is intended or shall be deemed to constitute an assumption of any agreement pursuant to section 365 of the Bankruptcy Code or an admission as to the validity of any claim against the Debtors and their estates; (b) shall impair, prejudice, waive, or otherwise affect the rights of the Debtors and their estates with respect to the validity, priority, or amount of any claim against the Debtors and their estates; or (c) shall be construed as a promise to pay a claim.

NOTICE

15. Notice of this Motion has been provided to: (a) the Office of the United States Trustee for the District of Delaware (Attn: Richard L. Schepacarter); (b) the Debtors' twenty (20) largest unsecured creditors (excluding insiders); (c) counsel to the Agent; (d) the Internal Revenue Service; (e) the Securities and Exchange Commission; (f) the Office of the United States Attorney for the District of Delaware; and (g) the counterparties to the Contracts (via electronic mail and/or first class mail). In light of the nature of the relief requested herein, the Debtors submit that no other or further notice is necessary.

CONCLUSION

WHEREFORE, the Debtors request entry of the Proposed Order, granting the relief requested herein and such other and further relief as is just and proper.

Dated: May 24, 2023 Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Joseph M. Mulvihill

Michael R. Nestor (No. 3526) Matthew B. Lunn (No. 4119) Joseph M. Mulvihill (No. 6061) Jared W. Kochenash (No. 6557) 1000 North King Street Rodney Square Wilmington, Delaware 19801

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Proposed Counsel for Debtors and Debtors in Possession

EXHIBIT A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:)
) Chapter 11
PLASTIQ INC., et al., ¹)
) Case No. 23-10671 (BLS)
Debtors.)
) (Jointly Administered)
)
) Re: Docket No

ORDER AUTHORIZING REJECTION OF CERTAIN EXECUTORY CONTRACTS EFFECTIVE AS OF THE PETITION DATE

Upon consideration of the motion (the "Motion")² of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for the entry of an order authorizing the Debtors to reject, effective as of the Petition Date, certain executory contracts, as more fully set forth in the Motion; and this Court having reviewed the Motion and the First Day Declaration; and this Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and upon the record herein; and after due

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Plastiq Inc. (6125), PLV Inc. d/b/a/ PLV TX Branch Inc. (5084), and Nearside Business Corp. (N/A). The corporate headquarters and the mailing address for the Debtors is 1475 Folsom Street, Suite 400, San Francisco, California 94103.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

deliberation thereon; and this Court having determined that there is good and sufficient cause for the relief granted in this Order, therefore, **IT IS HEREBY ORDERED THAT:**

- 1. The Motion is GRANTED as set forth herein.
- 2. Pursuant to sections 105(a) and 365(a) of the Bankruptcy Code and Bankruptcy Rule 6006, the Contracts are hereby rejected by the Debtors, with such rejection being effective as of the Petition Date.
- 3. Nothing herein shall impair, prejudice, waive or otherwise affect the rights of the Debtors to: (a) assert that the Contracts (i) were terminated prior to the Petition Date, or (ii) are not executory contracts under 365 of the Bankruptcy Code; (b) assert that any claim for damages arising from the rejection of the Contracts is limited to the remedies available under any applicable termination provisions of the Contracts; (c) assert that any such claim is an obligation of a third party, and not that of the Debtors or their estates; or (d) otherwise contest any claims that may be asserted in connection with the Contracts. All rights, claims, defenses and causes of action that the Debtors and their estates may have against the counterparties to the Contracts, whether or not such claims arise under, are related to the rejection of, or are independent of the Contracts, are reserved, and nothing herein is intended or shall be deemed to impair, prejudice, waive or otherwise affect such rights, claims, defenses and causes of action.
- 4. Claims arising out of the rejection of the Contracts must be filed on or before the later of (a) the deadline for filing proofs of claim based on prepetition claims against any of the Debtors as set by an order of this Court or (b) thirty (30) days after entry of this Order.
 - 5. The requirements of Bankruptcy Rule 6006 are satisfied.
- 6. The Debtors are authorized to take any and all actions necessary to effectuate the relief granted herein.

- 7. Notwithstanding any applicability of Bankruptcy Rule 6004(h), the terms and conditions of this Order shall be effective and enforceable immediately upon its entry.
- 8. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Schedule 1¹

Rejected Contracts

Debtor	Creditor Name	Address	City	State	Zip	Country
	Halp	1515 Walnut Street,				
Nearside	(Assist App)	Suite 300	Boulder	CO	80302	USA
	Hammer & Neil	37 Lynnon Field, Chase			CV346	United
Nearside	Inc/Hammer Neil	Meadow, Warwick	Warwickshire		DH	Kingdom
					19178-	
Nearside	Hartford Ins	PO Box 8500-3690	Philadelphia	PA	3690	USA
Nearside	HelloFax	1800 Owens St	San Francisco	CA	94158	USA
					V5T	
Nearside	Hootsuite	111 East 5th Avenue	Vancouver	BC	4L1	Canada
		7037 Ridge Road, Suite				
Nearside	Hudson Cook	300	Hanover	MD	21076	USA
					M5J	
Nearside	Humi	207 Queens Quay W #400	Toronto	ON	1A7	Canada
	Hunton Andrews					
Nearside	Kurth LLP	951 East Byrd Street	Richmond	VA	23219	USA
		2018 Powers Ferry Road				
Nearside	Idology	SE, Suite 720	Atlanta	GA	30339	USA
Nearside	IFTTT	PO Box 590547	San Francisco	CA	94159	USA
Nearside	IHEALTH LABS	150C Charcot Ave	San Jose	CA	95131	USA
		223 East De La Guerra				
Nearside	Impact	Street	Santa Barbara	CA	93101	USA
Nearside	Instagram	1601 Willow Road	Menlo Park	CA	94025	USA
Nearside	Intego	801 Barton Springs Floor 9	Austin	TX	78704	USA
	INTELLA DBA	347 5 th Avenue,				
Nearside	LIMELEADS	Suite 1402-756	New York	NY	10016	USA
		Suite 313- 1240 20th Ave			T2G	
Nearside	iStock	SE	Calgary	AB	1M8	Canada
		71 Stevenson Street, Suite				
Nearside	Iterable	300	San Francisco	CA	94105	USA
		1309 Coffeen Avenue,				
Nearside	Jetboost	Suite 1200	Sheridan	WY	82801	USA
Nearside	Kaiser	1 Kaiser Plaza	Oakland	CA	94612	USA
	Kaizen Platform	505 Montgomery St, 10th				
Nearside	USA, Inc	Floor	San Francisco	CA	94111	USA
Nearside	Kandji	101 West Broadway	San Diego	CA	92101	USA
	Kard Financial,				400:0	
Nearside	Inc.	Flatiron	New York	NY	10010	USA
37 11	Klaus/QUALITIS	N. 1.2 20.1/11	T. 11:		10124	
Nearside	TA	Vana-Lõuna 39-1/11	Tallinn	3.5	10134	Estonia
Nearside	LastPass	333 Summer St	Boston	MA	02210	USA
Nearside	Lattice	360 Spear St, Floor 4	San Francisco	CA	94105	USA

Certain of the Contracts may have expired or terminated by their own terms prior to the filing of the Motion. The Debtors seek to reject such Contracts out of an abundance of caution to avoid potentially incurring further costs and expenses.

Debtor	Creditor Name	Address	City	State	Zip	Country
		1999 Harrison St, Suite	·			· ·
Nearside	LaunchDarkly	1100	Oakland	CA	94612	USA
		601 California Street, Suite				
Nearside	Law Champs	1210	San Francisco	CA	94108	USA
	Lending Club					
Nearside	Bank	1 Harbor Street, Suite 201	Boston	MA	02110	USA
Nearside	Lever	155 5th St, 6th Floor	San Francisco	CA	94103	USA
Nearside	LinkedIn	1000 W Maude Ave,	Sunnyvale	CA	94085	USA
NT '1	1 ' 171 '	c/o Puzzle Financial,	с г		0.4107	TICA
Nearside	Lisa Kleinsorge	58 South Park	San Francisco	CA	94107 94107-	USA
Nearside	Lob	210 King St	San Francisco	CA	1702	USA
rearside	Loo	7171 Southwest Parkway,	San Trancisco	CA	1702	USA
Nearside	Loggly	Bldg 400	Austin	TX	78735	USA
Nearside	LogicLoop	2261 Market Street, #4312	San Francisco	CA	94114	USA
Nearside	Lookback	470 Ramona St	Palo Alto	CA	94301	USA
rearside	Lucid Software,	10355 South Jordan	Taio Aito	CA	74301	OBA
Nearside	Inc.	Gateway, Suite 150	South Jordan	UT	84095	USA
		675 Ponce de Leon Ave			0.1070	
Nearside	Mailchimp	NE, Suite 500	Atlanta	GA	30308	USA
Nearside	Mailgun	112 E Pecan St #1135	San Antonio	TX	78205	USA
Nearside	Marqeta	180 Grand Ave, Suite 600	Oakland	CA	94612	USA
	Mastercard					
	Optimization					
Nearside	solutions	2000 Purchase Street	Purchase	NY	10577	USA
37 11	Mercury		G . F .		0.4102	110
Nearside	Technologies Inc	81 Langton St, Unit 4	San Francisco	CA	94103	USA
Nearside	Metabase	660 4th Street #557	San Francisco	CA	94107	USA
Nearside	Metaplane	29 Calvin St, Apt 3	Somerville	MA	02143	USA
Nearside	Middesk	85 2nd St, Suite 710	San Francisco	CA	94105	USA
NT '1	MindTrackers	NI HIH D I	G 1 11		CB2	United
Nearside	Limited	Nine Hills Road	Cambridge	C.4	1GE	Kingdom
Nearside	Mode	208 Utah St Suite 400 1752 NW Market Street #	San Francisco	CA	94103	USA
Nearside	Moz	4073	Seattle	WA	98107	USA
rearside	IVIOZ	4600 East Washington	Scattic	WA	90107	USA
Nearside	NameCheap	Street, Suite 305	Phoenix	AZ	85034	USA
					98124-	
Nearside	Navia	PO Box 35193	Seattle	WA	5193	USA
	Navia Benefit					
Nearside	Solutions, Inc.	600 Naches Ave SW	Renton	WA	98057	USA
Nearside	NCR Corporation	864 Spring St NW	Atlanta	GA	30308	USA
Nearside	NCR Corporation	864 Spring Street	Atlanta	GA	30308	USA
Nearside	Neat.no	400 Capital Mall, Suite 900	Sacramento	CA	95814	USA
		Technopolis,				
Nearside	Neat.no	Rolfsbuktveien 4 C	Fornebu		1364	Norway
			Mountain			
Nearside	Neo.Tax	713 N Shoreline Blvd	View	CA	94043	USA
	Newfront Insurance/					
		1	1	1	1	1

Debtor	Creditor Name	Address	City	State	Zip	Country
	Newfront					
	Insurance/					
Nearside	Beam Benefits	80 E Rich St, Suite 400	Columbus	ОН	43215	USA
Nearside	Newfront	000 Cattaga Crava Bood	Bloomfield	CT	06002	USA
Nearside	Insurance/Cigna Newfront	900 Cottage Grove Road	Bioomileid	CI	06002	USA
	Retirement	777 Mariners Island Blvd.,				
Nearside	Services, Inc.	Suite 250	San Mateo	CA	94404	USA
110010100	Nomadic	2000	2411111400		МЗН	0 0 1 1
Nearside	Solutions	255 Waterloo Ave	North York	ON	3Z5	Canada
Nearside	Notion	7616 Big Bend Blvd	St. Louis	MO	63119	USA
Nearside	Nova Credit	225 Valencia Street	San Francisco	CA	94103	USA
Nearside	NYS OSC	110 State Street	Albany	NY	12236	USA
1,0010100	1115 555	101 Greenwich Street, Fl.		111	12200	0.011
Nearside	Ocrolus	23	New York	NY	10006	USA
					98052-	
Nearside	Office 365	One Microsoft Way	Redmond	WA	6399	USA
		Colman House Colman			GL54	United
Nearside	Officely	Temple Guiting	Cheltenham		5RT	Kingdom
		P.O. Box 743620, 14th				
Nearside	Okta	Floor	Los Angeles	CA	90074	USA
Nearside	OpenPhone	2261 Market St, 4157	San Francisco	CA	94114	USA
	Outback Team		North		V7L	
Nearside	Building	332 Esplanade E	Vancouver	BC	1A4	Canada
		111 West 19th Street,	N. 77. 1		10011	110 1
Nearside	Outbrain	Third Floor	New York	NY	10011	USA
M: 1-	Da a a Dasta	Dept 3817,	Dallas	TV	75212	TICA
Nearside	PagerDuty	PO Box 123817	Dallas	TX	75312 M5V	USA
Nearside	Partner Stack	129 Spadina Ave	Toronto	ON	1J7	Canada
Nearside	Pave	1 Montgomery St. Floor 7	San Francisco	CA	94104	USA
Nearside	rave	222 W. Merchandise Mart	San Francisco	CA	94104	USA
Nearside	PeanutButter	Plaza, Suite 1212	Chicago	IL	60654	USA
Nearside	Penji	1 Market Street	Camden	NJ	08102	USA
Nearside	Perfect Plastics	311 Kautz Road	St. Charles	IL	60174	USA
Nearside	Persona	353 Sacramento St.	San Francisco	CA	94111	USA
rearside	Pilot Tax	333 Sacramento St.	San Trancisco	CA	94120-	USA
Nearside	Services	PO Box 7775 #86889	San Francisco	CA	7775	USA
Nearside	Pinterest	505 Brannan Street	San Francisco	CA	94107	USA
Nearside	Plaid	1098 Harrison Street	San Francisco	CA	94103	USA
Nearside	riaiu	ATTN: Pocket Business	San Francisco	CA	94103	USA
		Unit,				
		2 Harrison Street, Suite				
Nearside	Pocket	175	San Francisco	CA	94105	USA
Nearside	Pollfish	205 # 42nd Street	New York	NY	10017	USA
Nearside	POSTALYTICS	55 Accord Park Dr.	Rockland	MA	02370	USA
1.carbiae	10011111100	201 Mission Street Suite	Toomana	1,17,1	02370	0011
Nearside	Postman	2375	San Francisco	CA	94105	USA
	Presidio Legal,			<u> </u>	1	<u> </u>
Nearside	P.C.	340 S Lemon Ave #9501	Walnut	CA	91789	USA
Nearside	Primer Video	1895 Jackson St, Suite 503	San Francisco	CA	94109	USA

Debtor	Creditor Name	Address	City	State	Zip	Country
			o no	2000	E2L	Couriery
Nearside	ProcedureFlow	1 Market Square, Suite 143	Saint John	NB	4Z6	Canada
Nearside	Productfy	5442 Monterey Road #176	San Jose	CA	95138	USA
Nearside	ProductPlan	836 Anacapa St, #944	Santa Barbara	CA	93101	USA
Nearside	Proxy	60 Francisco Street	San Francisco	CA	94133	USA
Nearside	Pulumi	1525 4th Ave, Suite 800	Seattle	WA	98101	USA
			Mountain			
Nearside	QUORA	650 Castro St	View	CA	94041	USA
Nearside	Realsearch	PO Box 353159	Palm Coast	FL	32135	USA
Nearside	Red Antler	20 Jay Street, Suite 420	Brooklyn	NY	11201	USA
Nearside	Reddit	1455 Market Street, Suite 1600	San Francisco	CA	94103	USA
Nearside	ReTool	292 Ivy St	San Francisco	CA	94102	USA
		2443 Fillmore St #380-			,	
Nearside	Rippling	7361	San Francisco	CA	94115	USA
Nearside	Salesforce	Salesforce Tower, 415 Mission Street, 3 rd Floor	San Francisco	CA	94105	USA
Nearside	Sapphire Studios	1000 W 8th St	Los Angeles	CA	90017	USA