

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHARACTER TECHNOLOGIES, INC.,¹

Debtor.

Chapter 11

Case No. 26-11603 ([____])

**DEBTOR’S MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING THE DEBTOR
TO REDACT CERTAIN PERSONAL IDENTIFICATION INFORMATION IN THE
CREDITOR MATRIX AND CERTAIN OTHER DOCUMENTS, (II) AUTHORIZING
AND APPROVING PROCEDURES FOR PROVIDING NOTICE OF
COMMENCEMENT, AND (III) GRANTING RELATED RELIEF**

The debtor and debtor in possession in the above-captioned case (the “Debtor”) hereby submits this motion (this “Motion”) for entry of interim and final orders, substantially in the forms attached hereto as **Exhibit A** (the “Interim Order”) and **Exhibit B** (the “Final Order” and, together with the Interim Order, the “Proposed Orders”) granting the relief described below. In support hereof, the Debtor relies on the *Declaration of Colin M. Adams in Support of the Debtor’s Chapter 11 Petition and First Day Motions* (the “First Day Declaration”)² filed concurrently herewith and incorporated by reference, and further represents as follows:

JURISDICTION AND VENUE

1. The Court has jurisdiction to consider this Motion under 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 February 29, 2012. Pursuant to rule 9013-1(f) of the Local Rules of the United

¹ The Debtor and the last four digits of its taxpayer identification number are: Character Technologies, Inc. (8842). The Debtor’s mailing address for purposes of the chapter 11 case is 700 El Camino Real, Suite 120, P.O. Box 1152, Menlo Park, CA 94025.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the First Day Declaration.

States Bankruptcy Court for the District of Delaware (the “Local Rules”), the Debtor confirms its consent 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.

2. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue of this chapter 11 case and this Motion is proper in this district under 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested herein are sections 105(a) and 107(c) of title 11 of the United States Code, as amended (the “Bankruptcy Code”), rules 2002, 9007, and 9013 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Local Rules 2002-1, 9013-1(m), and 9018-1(d).

RELIEF REQUESTED

4. The Debtor respectfully requests entry of the Proposed Orders: (i) authorizing the Debtor to redact certain personal identification information from its creditor matrix (the “Creditor Matrix”), the top 20 largest unsecured creditors list (the “Top 20 Creditors List”), the list of equity interest holders (the “List of Equity Interest Holders”), the schedules of assets and liabilities and statements of financial affairs (the “Schedules and Statements”), and other documents filed in this chapter 11 case, (ii) authorizing the Debtor to implement certain procedures for the publication of the notice announcing the commencement of this chapter 11 case and the meeting of creditors to be held pursuant to section 341 of the Bankruptcy Code (the “Notice of Commencement”), and (iii) granting related relief.

BACKGROUND

5. On October 12, 2026 (the “Petition Date”), the Debtor filed a voluntary petition for relief pursuant to chapter 11 of the Bankruptcy Code. The Debtor is operating its business and managing its properties as debtor in possession pursuant to sections 1107(a) and 1108 of the

Bankruptcy Code. No request for the appointment of a trustee or examiner has been made in this chapter 11 case, and no official committee of unsecured creditors has been appointed in this chapter 11 case.

6. The Debtor is a first in kind artificial intelligence (“AI”) entertainment platform that allows users to have immersive, multimodal experiences with fictional or imagined characters. What started as a platform to have one-on-one chats tailored to user preferences, has evolved to become a category leader in entertainment AI. Today, the Character.AI platform generates stunning visuals that become part of a story, creates dynamic video content with AI characters, and actively augments videos and stories with rich audio experiences to enhance immersion. In its 4-year lifespan as an active platform, Character has amassed a large and engaged user base. The burgeoning and evolving field of AI entertainment, however, has proven to be costly to develop and grow. These high costs, coupled with potential litigation related liabilities and regulatory engagement have contributed to the Debtor’s inability to generate sufficient cash flows to support its business in the present form. The Debtor has commenced this case to engage in value-maximizing transactions for the benefit of its stakeholders.

7. Additional factual background regarding the Debtor, including its business operations, its corporate and capital structure, and the events leading to the filing of this chapter 11 case, is set forth in detail in the First Day Declaration and incorporated herein by reference.

BASIS FOR RELIEF REQUESTED

I. CAUSE EXISTS TO REDACT CERTAIN PERSONAL IDENTIFICATION INFORMATION

8. Although the public has a common law “right of access to judicial proceedings and records,” *Goldstein v. Forbes (In re Cendant Corp.)*, 260 F.3d 183, 192 (3d Cir. 2001), the Bankruptcy Code permits courts, in appropriate circumstances, to protect individuals from an

undue risk of identity theft or other unlawful injury by limiting the public’s access, placing papers under seal, or otherwise entering orders to prohibit the dissemination of sensitive information. *See* 11 U.S.C. § 107(c); *see also Cendant*, 260 F.3d at 194 (noting the public’s right of access “is not absolute”) (citation and internal quotation marks omitted); *Leucadia, Inc. v. Applied Extrusion Tech., Inc.*, 998 F.2d 157, 165 (3d Cir. 1993) (“Although the right of access is entrenched, so also is the correlative principle that the right is not absolute.”) (citation and internal quotation marks omitted).

9. Section 107(c) of the Bankruptcy Code provides that the Court “for cause, may protect an individual, with respect to the following types of information to the extent the court finds that disclosure of such information would create undue risk of identity theft or other unlawful injury to the individual[:] . . . [a]ny means of identification . . . contained in a paper filed, or to be filed, in a case under” the Bankruptcy Code. 11 U.S.C. § 107(c)(1)(A).

10. In addition, privacy protection regulations are commonplace in key jurisdictions where the Debtor operates. For instance, in 2018, the state of California enacted the California Consumer Privacy Act of 2018 (as amended, the “CCPA”), which provides individuals domiciled in California the right to request that their collected personal information be deleted by entities subject to the regulation.³ Violators risk injunctions and civil penalties of up to \$2,500 for *each* violation and up to \$7,500 for *each intentional* violation. Cal. Civ. Code § 1798.155. The CCPA applies to all for-profit entities doing business in California (the “CCPA Entities”) that collect and process consumers’ personal data and satisfy one of the following criteria: (a) annual gross revenue

³ In *Pier 1 Imports*, Judge Huennekens was aware that publishing certain unredacted documents on the docket could implicate serious CCPA issues: “the State of California has adopted very extensive privacy provisions that would cover something like this. And do we need -- I mean, and this does -- this company does business in California. I mean, there’re going to be concerns there, are there not?” Hr’g Tr. 43:2-6, *In re Pier 1 Imports, Inc.*, No. 20- 30805 (KRH) (Bankr. E.D. Va. Mar. 13, 2020) [Docket No. 359].

in excess of \$25 million; (b) buys, shares, receives, or sells the personal information of more than 100,000 consumers or households; or (c) receives 50% or more of their annual revenues from selling consumers' personal information. Cal. Civ. Code § 1798.140(d)(1). The Debtor likely qualifies as a CCPA Entity because the bulk of the Debtor's operations and employees are located in California and the Debtor receives personal information from consumers that number in the millions in connection with its operations.

11. Other key jurisdictions also have privacy and data protection regulations. The United Kingdom Data Protection Act of 2018 and the United Kingdom General Data Protection Regulation (together, the "UK GDPR"), the European General Data Protection Regulation (the "EU GDPR"), and similar laws in other jurisdictions impose significant constraints on the processing (which includes the transferring or disclosing) of information relating to identified or identifiable individuals (which includes names and addresses of individuals and individual business contacts) ("Personal Data"). The UK GDPR and the EU GDPR apply to the processing of Personal Data in the context of an establishment of a controller or processor in the United Kingdom, or the European Economic Area, respectively, regardless of whether the processing takes place in the United Kingdom or the European Economic Area (and, in some circumstances, organizations established in other countries when processing Personal Data relating to individuals located in the United Kingdom or European Economic Area).

12. The UK GDPR and the EU GDPR require a legal basis for all processing (including the disclosure) of Personal Data. The only possible legal basis that may apply for disclosing the Personal Data in this instance would be the "legitimate interests" ground. Article 6(1)(f) UK GDPR and EU GDPR. This ground, however, can be relied on as a legal basis only if the processing is necessary to achieve the relevant purpose, and if the same result can reasonably be

achieved in a less intrusive way, the legitimate interest basis no longer applies. Nor can the legitimate interest assessment serve as a legal basis if the rights and freedoms of the relevant individuals override the legitimate interest in question. UK and EU regulators take the position that if a person would not reasonably expect the processing, their interests are likely to override any legitimate interests. *See id.*⁴ Moreover, the legal basis of “compliance with a legal obligation,” Article 6(1)(c) UK GDPR and EU GDPR, would not be applicable here, since it is restricted to legal obligations under UK or EU law, and not foreign laws such as the Bankruptcy Code.

13. In addition, processing (including disclosure) under the UK GDPR and the EU GDPR must comply with certain key principles, including the principle of data minimization, which requires that any processing must be necessary in relation to its purpose. Disclosure of the unredacted home and e-mail addresses (or other Personal Data) of individual creditors, employees, stockholders or parties in interest on the public docket is not necessary for any purpose in administering this chapter 11 case. The right of individuals not to have their unredacted home and e-mail addresses (or other Personal Data) disclosed on the public docket would also override any legitimate interest of disclosing such information to facilitate this chapter 11 case. By redacting Personal Data on the public docket, the Debtor is thus complying with its obligations under the Bankruptcy Code, protecting individuals’ interests and right to privacy, and abiding by one of the foundational principles of the UK GDPR and the EU GDPR.

14. Further, such information, if disclosed, could be used by third parties to, among other things, perpetrate identity theft or locate survivors of domestic violence or stalking who have otherwise taken steps to conceal their whereabouts. This risk is not merely speculative. In at least one reported chapter 11 case, the abusive former partner of a debtor’s employee exploited the

⁴ See Information Commissioner’s Office, Legitimate Interests, (Mar. 23, 2026), <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/legitimate-interests/> (last visited Oct. 9, 2026).

publicly accessible creditor and employee information filed in the chapter 11 case to track the employee to her new address, which had not been publicly available until then, forcing the employee to change addresses again for her safety.⁵ Moreover, over the years, the Debtor's employees have also been subject to threats of violence and the Debtor employs physical security for this concern.

15. Courts in this district have stressed the importance of authorizing debtors to redact individual creditors' personally identifiable information and home addresses in particular. In overruling an objection by the U.S. Trustee in *Art Van Furniture* to relief similar to that which is being requested herein, the court noted that the proposed redaction is not a "burden of proof" issue so "much as a common sense issue." Hr'g Tr. at 25:6–7, *In re Art Van Furniture, LLC*, No. 20-10553 (CSS) (Bankr. D. Del. Mar. 10, 2020) [Docket No. 82].⁶ The court found that "at this point and given the risks associated with having any kind of private information out on the internet, [redaction] has really become routine [and] I think obvious relief." *Id.* at 25:13-16. Similarly, in *Clover Techs.*, the court overruled the U.S. Trustee's objection, noting that:

[t]o me it is common sense. I don't need evidence that there is, at best, a risk of identity theft and worse a risk of personal injury from listing someone's name and address on the internet by way of the court's electronic case filing system and, of course, the claims agent's website. . . . The court can completely avoid contributing to the risk by redacting the addresses. And while there is, of course,

⁵ The incident, which took place during the first Charming Charlie chapter 11 proceedings in 2017, is described in the "creditor matrix motion" filed in *In re Charming Charlie Holdings, Inc.*, Case No. 19-11534 (CSS) (Bankr. D. Del. Jul. 11, 2019) [Docket No. 4].

⁶ Similarly, the court previously overruled the U.S. Trustee's objection to the redaction of individuals' information and found that "it's just plain common sense in 2019—soon to be 2020—to put as little information out as possible about people's personal lives to present [sic] scams . . . [Identity theft] is a real-life issue, and, of course, the issue of domestic violence is extremely important." Hr'g Tr. at 48:20-22, 49:3-5, *In re Anna Holdings*, No. 19-12551 (CSS) (Bankr. D. Del. Dec. 3, 2019) [Docket No. 112].

Notably, the court acknowledged that "the world is very different from [the 1980s] when you and I started practice with the problems of identity theft" and that his perspective had evolved in that he was not previously aware of "the dangers with this kind of information becoming public." See Hr'g Tr. at 45:25-46:2, 47:22-24. The Debtor reserves the right to supplement the record with respect to such risks insofar as they are not self-evident in this instance.

an important right of access we routinely redact sensitive and confidential information for corporate entities and redact individual's home addresses.

Hr'g Tr. at 24:21-25, 25:9-10, *In re Clover Techs. Grp., LLC*, No. 19-12680 (KBO) (Bankr. D. Del. Jan. 22, 2020) [Docket No. 146]. And, in *Forever 21*, in overruling the U.S. Trustee's objection, the court found that "[w]e live in a new age in which the theft of personal identification is a real risk, as is injury to persons who, for personal reasons, seek to have their addresses withheld." Hr'g Tr. at 60:22-25, *In re Forever 21, Inc.*, No. 19-12122 (KG) (Bankr. D. Del. Dec. 19, 2019) [Docket No. 605].

16. Courts in this district have permitted redactions of personal information the Debtor seeks to redact here, including individuals' names. *See In re FTX Trading Ltd.*, Civ. No. 23-682 (CFC), 2024 WL 4948827 at *8-9 (D. Del. Dec. 3, 2024) (affirming the Court's ruling to permanently redact the names, home and email addresses of the debtors' customers finding that the debtors' customer list fell within the ambit of section 107(b)(1) of the Bankruptcy Code, that the Bankruptcy Court's determination to protect the customer list was not an abuse of discretion, and that sealing the information preserved the debtors' business assets).

17. Here, the Debtor seeks to redact the names, home addresses, and emails of individuals who appear on the Creditor Matrix, the Top 20 Creditors List, the List of Equity Interest Holders, the Schedules and Statements and other documents filed in this chapter 11 case, which the Debtor submits is appropriate based on the facts of this case and consistent with precedent in this jurisdiction. *See In re Boy Scouts of America*, No. 20-10343 (LSS) (Bankr. D. Del. Mar. 23, 2020) (authorizing the debtors to redact personal contact information for any minors and their parents or legal guardians and redact personal contact information for any current and former employee or volunteer of the Debtors); *see also, In re Am. Tire Distribs., Inc.*, No. 24-12391 (CTG) (Bankr. D. Del. Nov. 18, 2024) (authorizing the debtors to redact the names, street addresses, and

email addresses of customers from any filings with the court or made publicly available); *In re SunPower Corp.*, No. 24-11649 (CTG) (Bankr. D. Del. Aug. 28, 2024) (authorizing the debtors to redact the street and email addresses of the debtors' customers from any filings with the court or made publicly available); *In re PGX Holdings, Inc.*, No. 23-10718 (CTG) (Bankr. D. Del. July 19, 2023) (authorizing the debtors to redact the names of customers); *In re SiO2 Med. Prods., Inc.*, No. 23-10366 (JTD) (Bankr. D. Del. June 15, 2023) (same); *In re Boxed, Inc.*, No. 23-10397 (BLS) (Bankr. D. Del. Apr. 25, 2023) (authorizing the debtors to redact confidential customer information from any filings with the court or made publicly available); *In re Cred Inc.*, No. 20-12836 (JTD) (Bankr. D. Del. Dec. 21, 2020) (authorizing the debtors to redact or withhold the publication of customer names, mailing addresses, and email addresses).

18. Notwithstanding the foregoing, the Debtor proposes to provide, on a confidential basis, unredacted versions of the Creditor Matrix, Top 20 Creditors List, List of Equity Interest Holders, Schedules and Statements, and any other redacted, applicable filings to this Court, the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee"), counsel to any statutory committee appointed in the chapter 11 case, and other such parties as ordered by the Court, which will ensure that certain parties receive fully unredacted information while balancing the Debtor's concerns about safeguarding parties' safety and privacy.

19. For these reasons, the Debtor respectfully submits that cause exists to authorize the Debtor to seal, pursuant to 11 U.S.C. § 107(c)(1), personally identifiable information, including names and home addresses and emails for all individuals listed on the Creditor Matrix, Top 20 Creditors List, the List of Equity Interest Holders, Schedules and Statements, or any other document filed with this Court.

II. AUTHORIZATION TO PROVIDE SUPPLEMENTAL NOTICE OF COMMENCEMENT

20. Bankruptcy Rule 2002(a)(1) provides that the clerk (or other person as directed by the court) must give the debtor, the trustee, all creditors, and any indenture trustee at least twenty-one (21) days' notice by mail of the meeting of creditors under section 341 of the Bankruptcy Code. Bankruptcy Rules 2002(m) and 9007 empower the Court with the general authority to regulate the manner in which notices required under the Bankruptcy Rules are provided. Specifically, Bankruptcy Rule 2002(m) provides that “[e]xcept as these rules provide otherwise, the court may designate the matters about which, the entity to whom, and the form and manner in which a notice must be sent.” Fed. R. Bankr. P. 2002(m). Furthermore, the Bankruptcy Court has authority under Bankruptcy Rule 2002(l) to “order notice by publication if notice by mail is impracticable or if it is desirable to supplement the notice.” Fed. R. Bankr. P. 2002(l). Bankruptcy Rule 9007 provides that “[u]nless these rules provide otherwise, when notice is to be given, the court must designate: (1) the deadline for giving it; (2) the entities to whom it must be given; and (3) the form and manner of giving it.” Fed. R. Bankr. P. 9007(a).

21. The Debtor will provide the Notice of Commencement to its known creditors in accordance with the Bankruptcy Rules. In addition, the Debtor intends to publish the Notice of Commencement on the Claims and Noticing Agent’s website and the Debtor’s blog, and to provide notice of the chapter 11 case and links to the foregoing websites on its community engagement pages and/or its platform. While the Debtor does not believe its current and past platform users are creditors to whom notice must be provided, the Debtor historically has communicated with such parties through its platform, blog posts on the Debtor’s website or online community webpages.⁷

⁷ In addition, serving all of the Debtor’s current and past platform users (approximately 163 million), even through email, would be cost-prohibitive.

Publication in this manner via these channels is the most practical method by which the Debtor's platform users can be provided notice of this chapter 11 case and will ensure an efficient use of limited estate resources.

COMPLIANCE WITH LOCAL RULE 9018-1

22. Under the circumstances, and given the nature of the relief requested herein, the Debtor has not been able to confer with the individuals whose information is requested to be sealed and, accordingly, the Debtor submits that there is cause to excuse the Debtor from the meet and confer obligations under Local Rule 9018-1(d). Additionally, in accordance with Local Rule 9018-1(d), the Debtor will file publicly viewable redacted versions of the Creditor Matrix, Top 20 Creditors List, List of Equity Interest Holders, Schedules and Statements, and any other filings redacted in accordance with the Proposed Orders.

NOTICE

23. The Debtor will provide notice of this Motion to: (a) the U.S. Trustee; (b) the United States Attorney's Office for the District of Delaware; (c) the state attorneys general for all states in which the Debtor conducts business; (d) the Internal Revenue Service; (e) the Top 20 Creditors List; (f) counsel to Disney; and (g) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtor will serve copies of this Motion and any order entered in respect hereto as required by Local Rule 9013-1(m). The Debtor respectfully submits that, in light of the nature of the relief requested, no further notice is necessary.

CONCLUSION

WHEREFORE, the Debtor respectfully requests that this Court enter the Interim Order and Final Order, substantially in the forms annexed hereto as **Exhibit A** and **Exhibit B**, respectively, granting the relief requested herein and such other and further relief as may be just and proper.

Dated: October 13, 2026
Wilmington, Delaware

WILSON SONSINI GOODRICH & ROSATI, P.C.

/s/ Erin R. Fay

Erin R. Fay (No. 5268)

Shane M. Reil (No. 6195)

Heather P. Lambert (No. 6923)

222 Delaware Avenue, Suite 800

Wilmington, Delaware 19801

Telephone: (302) 304-7600

E-mails: efay@wsgr.com

sreil@wsgr.com

hlambert@wsgr.com

Proposed Counsel to the Debtor and Debtor in Possession

EXHIBIT A

Interim Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHARACTER TECHNOLOGIES, INC.,¹

Debtor.

Chapter 11

Case No. 26-11603 ([____])

Ref. Docket No. __

**INTERIM ORDER (I) AUTHORIZING THE DEBTOR TO REDACT CERTAIN
PERSONAL IDENTIFICATION INFORMATION IN THE CREDITOR
MATRIX AND CERTAIN OTHER DOCUMENTS, (II) AUTHORIZING AND
APPROVING PROCEDURES FOR PROVIDING NOTICE OF
COMMENCEMENT, AND (III) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)² of the Debtor for entry of this interim order (this “Interim Order”) and a final order (the “Final Order”) (i) authorizing the Debtor to redact certain personal identification information from the Creditor Matrix, the Top 20 Creditors List, the List of Equity Interest Holders, the Schedules and Statements, and other similar documents, (ii) authorizing and approving publication procedures for noticing the Notice of Commencement, and (iii) granting related relief, all 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 February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b) 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

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

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 deliberation thereon; and this Court having determined that there is good and sufficient cause for the relief granted in this Interim Order, therefore,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED on an interim basis as set forth herein.
2. The final hearing on the Motion (the “Final Hearing”) is set for _____, 2026 at ____:____ a.m./p.m. (prevailing Eastern Time). Any objections or responses to the entry of the proposed Final Order shall be filed on or before 4:00 p.m. (prevailing Eastern Time) on _____, 2026 (the “Objection Deadline”), and shall be served on the following parties or their respective counsel on or before the Objection Deadline: (i) proposed counsel to the Debtor, Wilson Sonsini Goodrich & Rosati, P.C., 222 Delaware Avenue, Suite 800, Wilmington, DE 19801 (Attn: Erin R. Fay, Shane M. Reil, and Heather P. Lambert (emails: efay@wsgr.com, sreil@wsgr.com, and hlambert@wsgr.com)); (ii) the Office of the United States Trustee for the District of Delaware, 844 N. King Street, Room 2207, Wilmington, DE 19801 (Attn: Linda Casey (email: Linda.Casey@usdoj.gov)); and (iii) counsel to any statutory committee appointed in this chapter 11 case. If no objections or responses are filed and served by the Objection Deadline, the Court may enter the Final Order without further notice or hearing.
3. The Debtor and the Claims and Noticing Agent are authorized to redact personal identification information in the Creditor Matrix, Top 20 Creditor List, List of Equity Interest Holders, the Schedules and Statements, any related affidavits of service, and any other documents filed with this Court, including the names, home addresses, email addresses, and other personally identifiable information and personal data of all natural persons; provided that the Debtor shall

provide unredacted versions of the Creditor Matrix, Top 20 Creditor List, List of Equity Interest Holders, the Schedules and Statements, the list of equity security holders, proofs of claim, any related affidavits of service, and any other filings redacted pursuant to this Interim Order to (i) this Court via filing unredacted copies under seal; (ii) the U.S. Trustee; (iii) counsel to any official committee appointed in this chapter 11 case; (iv) the Claims and Noticing Agent; and (v) any party in interest with the consent of the Debtor or further order of this Court; *provided* that any receiving party shall not transfer or otherwise provide such unredacted document to any person or entity not party to the request and shall represent that the unredacted version(s) of the documents will be maintained in confidence. Nothing herein precludes a party in interest's right to file a motion requesting that this Court unseal the information redacted by this Interim Order.

4. When serving any notice in this case on individual persons, the Claims and Noticing Agent, and, where applicable, the Clerk of the Court, shall use the address the Debtor has on file for such individual, which shall not be the Debtor's general mailing address.

5. Nothing in this Interim Order shall waive or otherwise limit the service of any document upon or the provision of any notice to any individual solely because such individual's personally identifiable information is sealed or redacted pursuant to this Interim Order. Service of all documents and notices upon individuals whose personally identifiable information is sealed or redacted pursuant to this Interim Order shall be confirmed in the corresponding certificate of service. The Debtor shall provide the personally identifiable information to any party in interest that files a motion that indicates the reason such information is needed and that, after notice and a hearing, is granted by this Court. Alternatively, the Debtor is authorized to facilitate service of process through the Claims and Noticing Agent for any party in interest required to serve a creditor

whose information has been redacted pursuant to this Interim Order and arrange for reimbursement of expenses on account of such service with said party in interest.

6. The Debtor is authorized to cause the Notice of Commencement to be published on the Claims and Noticing Agent's website and the Debtor's blog, and to provide notice of the chapter 11 case and links to the foregoing websites on its community engagement pages and/or its platform.

7. The form and manner of notice provided herein are reasonably calculated to inform interested parties of this chapter 11 case and are hereby approved.

8. This Interim Order shall be immediately effective and enforceable upon its entry.

9. The Debtor is hereby authorized to take such actions and to execute such documents as may be necessary to implement the relief granted by this Interim Order.

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

EXHIBIT B

Final Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHARACTER TECHNOLOGIES, INC.,¹

Debtor.

Chapter 11

Case No. 26-11603 ([____])

Ref. Docket Nos. __ & __

**FINAL ORDER (I) AUTHORIZING THE DEBTOR TO REDACT CERTAIN
PERSONAL IDENTIFICATION INFORMATION IN THE CREDITOR
MATRIX AND CERTAIN OTHER DOCUMENTS, (II) AUTHORIZING AND
APPROVING PROCEDURES FOR PROVIDING NOTICE OF
COMMENCEMENT, AND (III) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)² of the Debtor for entry of an interim order and this final order (this “Final Order”) (i) authorizing the Debtor to redact certain personal identification information from the Creditor Matrix, the Top 20 Creditors List, the List of Equity Interest Holders, the Schedules and Statements, and other similar documents, (ii) authorizing and approving publication procedures for noticing the Notice of Commencement, and (iii) granting related relief, all 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 February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b) 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

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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 deliberation thereon; and this Court having determined that there is good and sufficient cause for the relief granted in this Final Order, therefore,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED on a final basis as set forth herein.
2. The Debtor and the Claims and Noticing Agent are authorized to redact personal identification information in the Creditor Matrix, Top 20 Creditor List, List of Equity Interest Holders, the Schedules and Statements, any related affidavits of service, and any other documents filed with this Court, including the names, home addresses, email addresses, and other personally identifiable information and personal data of all natural persons; provided that the Debtor shall provide unredacted versions of the Creditor Matrix, Top 20 Creditor List, List of Equity Interest Holders, the Schedules and Statements, the list of equity security holders, proofs of claim, any related affidavits of service, and any other filings redacted pursuant to this Final Order to (i) this Court via filing unredacted copies under seal; (ii) the U.S. Trustee; (iii) counsel to any official committee appointed in this chapter 11 case; (iv) the Claims and Noticing Agent; and (v) any party in interest with the consent of the Debtor or further order of this Court; *provided* that any receiving party shall not transfer or otherwise provide such unredacted document to any person or entity not party to the request and shall represent that the unredacted version(s) of the documents will be maintained in confidence. Nothing herein precludes a party in interest's right to file a motion requesting that this Court unseal the information redacted by this Final Order.

3. When serving any notice in this case on individual persons, the Claims and Noticing Agent, and, where applicable, the Clerk of the Court, shall use the address the Debtor has on file for such individual, which shall not be the Debtor's general mailing address.

4. Nothing in this Final Order shall waive or otherwise limit the service of any document upon or the provision of any notice to any individual solely because such individual's personally identifiable information is sealed or redacted pursuant to this Final Order. Service of all documents and notices upon individuals whose personally identifiable information is sealed or redacted pursuant to this Final Order shall be confirmed in the corresponding certificate of service. The Debtor shall provide the personally identifiable information to any party in interest that files a motion that indicates the reason such information is needed and that, after notice and a hearing, is granted by this Court. Alternatively, the Debtor is authorized to facilitate service of process through the Claims and Noticing Agent for any party in interest required to serve a creditor whose information has been redacted pursuant to this Final Order and arrange for reimbursement of expenses on account of such service with said party in interest.

5. Notwithstanding anything herein to the contrary, the Debtor, with the assistance of the Claims and Noticing Agent, is authorized to cause notice the Notice of Commencement to be published on the Claims and Noticing Agent's website and the Debtor's blog, and to provide notice of the chapter 11 case and links to the foregoing websites on its community engagement pages and/or its platform.

6. The form and manner of notice provided herein are reasonably calculated to inform interested parties of this chapter 11 case and are hereby approved.

7. This Final Order shall be immediately effective and enforceable upon its entry.

8. The Debtor is hereby authorized to take such actions and to execute such documents as may be necessary to implement the relief granted by this Final Order.

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