

Hearing Date: June 24, 2025 at 10:00 a.m. (ET)
Objection Deadline: June 17, 2025 at 4:00 p.m. (ET)

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*Counsel to Michael Wyse, in his capacity as
Plan Administrator for the Wind-Down Debtor*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

VOYAGER DIGITAL HOLDINGS, INC., *et al.*,

Debtors.¹

)
) Chapter 11
)

) Case No. 22-10943 (MEW)
)

) (Jointly Administered)
)

**NOTICE OF FOURTH MOTION OF THE PLAN ADMINISTRATOR
FOR ENTRY OF AN ORDER EXTENDING THE DEADLINE
TO OBJECT TO PROOFS OF CLAIM**

PLEASE TAKE NOTICE that a hearing (the “Hearing”) on the *Fourth Motion of the Plan Administrator for Entry of an Order Extending the Deadline to Object to Proofs of Claim* (the “Motion”) ² filed by the Plan Administrator under the *Third Amended Joint Plan of Voyager Digital Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code*

¹ The Wind-Down Debtor in these chapter 11 cases consists of Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The service address and principal place of business is 51 JFK Parkway, First Floor West, Short Hills, NJ 07078.

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

[Docket No. 1166-1] of Voyager Digital Holdings, Inc., et al., will be held on **June 24, 2025 at 10:00 a.m., prevailing Eastern Time**. The Hearing will be conducted via Zoom for Government. Those wishing to participate in the Hearing must register their appearance by 4:00 p.m. the day prior to the Hearing by using the Court's *eCourt Appearances* tool at <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>.

PLEASE TAKE FURTHER NOTICE that the deadline to file and serve responses to the Motion is **June 17, 2025 at 4:00 p.m., prevailing Eastern Time** (the "Response Deadline"). Any responses or objections to the relief requested in the Motion shall: (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York; (c) be filed electronically with the Court on the docket of *In re Voyager Digital Holdings, Inc.*, No. 22-10943 (MEW) by registered users of the Court's electronic filing system and in accordance with all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York (which are available on the Court's website at <http://www.nysb.uscourts.gov>); and (d) be served in a manner consistent with the *Final Order (I) Establishing Certain Notice, Case Management, and Administrative Procedures and (II) Granting Related Relief* [Docket No. 240] and the procedures set forth therein.

PLEASE TAKE FURTHER NOTICE that only those responses or objections that are timely filed, served, and received will be considered at the Hearing. Failure to timely file an objection may result in the entry of an order granting the Motion as requested by the Plan Administrator.

PLEASE TAKE FURTHER NOTICE that copies of the Motion and other pleadings filed in these chapter 11 cases may be obtained free of charge by visiting the website

<https://www.investvoyager.com>. You may also obtain copies of the Motion and other pleadings filed in these chapter 11 cases by visiting the Court's website at <https://www.nysb.uscourts.gov/> in accordance with the procedures and fees set forth therein.

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Dated: New York, New York
May 29, 2025

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*Counsel to Michael Wyse, in his capacity as
Plan Administrator for the Wind-Down Debtor*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,)	
)	Case No. 22-10943 (MEW)
Debtors. ¹)	
)	(Jointly Administered)

**FOURTH MOTION OF THE PLAN ADMINISTRATOR
FOR ENTRY OF AN ORDER EXTENDING THE DEADLINE
TO OBJECT TO PROOFS OF CLAIM**

Michael Wyse, in his capacity as the Plan Administrator² of the Voyager Wind-Down Debtor, by and through his undersigned counsel, hereby submits this motion (the “Motion”)

¹ The Wind-Down Debtor in these chapter 11 cases consists of Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The service address and principal place of business is 51 JFK Parkway, First Floor West, Short Hills, NJ 07078.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Debtor’s *Third Amended Joint Plan of Voyager Digital Holdings, Inc and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 1166] (the “Plan”).

requesting entry of an order substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), extending the deadline to object to claims from June 3, 2025 through and including December 1, 2025. In support of this Motion, the Plan Administrator respectfully represents as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Southern District of New York (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.) from the United States District Court for the Southern District of New York. The Plan Administrator confirms his consent, pursuant to Rule 7008 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy 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.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b).

3. The statutory predicates for the relief requested herein is section 105 of title 11 of the United States Code (the “Bankruptcy Code”) and Bankruptcy Rule 9006.

BACKGROUND

4. On July 5, 2022, the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code (the “Chapter 11 Cases”). The Chapter 11 Cases were jointly administered for procedural purposes only.

I. Bar Date and Claims and Procedures Orders

5. On August 3, 2022, the Court entered the *Order (I) Setting Deadlines for Submitting Proofs of Claim, and (II) Approving Procedures for Submitting Proofs of Claim, and*

(III) *Approving Notice Thereof* [Docket No. 218] (the “Bar Date Order”). The Bar Date Order set October 3, 2022 at 5:00 p.m. (Prevailing Eastern Time) and January 3, 2023 at 5:00 p.m. (Prevailing Eastern Time) as the deadlines by which non-governmental claimants and governmental claimants, respectively, must file a proof of claim. On August 18, 2022, the Debtors provided notice of the Bar Date Order, in accordance with the procedures outlined therein, to potential claimants. *See Affidavit of Service of Gregory A. Lesage* [Docket No. 391].

6. On January 30, 2023, the Debtors filed the *Motion to Approve/Debtors’ Motion for an Order (I) Approving (A) Omnibus Claims Objection Procedures and Form of Notice, (B) Omnibus Substantive Claims Objections, and (C) Satisfaction Procedures and Form of Notice and (II) Waiving Bankruptcy Rule 3007(E)(6)* [Docket No. 925] (the “Claims Procedures Motion”) seeking to establish certain procedures for objecting to and resolving disputed claims.

7. On February 23, 2023, the Court entered the *Order (I) Approving (A) Omnibus Claims Objection Procedures and (B) Omnibus Substantive Claims Objections and Form of Notice and (II) Waiving Bankruptcy Rule 3007(e)(6)* [Docket No. 1067] (the “Procedures Order”), which granted the Claims Procedures Motion and authorized the Debtors to, among other things, file omnibus objections to multiple claims at a time, on various grounds, including those set forth in Bankruptcy Rule 3007(d) and the additional grounds set forth in the Procedures Order.

II. Plan Confirmation and Effective Date

8. On March 10, 2023, the Court entered the *Corrected and Amended Order (I) Approving the Second Amended Disclosure Statement and (II) Confirming the Third Amended Joint Plan of Voyager Digital Holdings, Inc and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 1166] (the “Confirmation Order”) confirming the Plan which, among other things, provided for the appointment of the Plan Administrator.

9. On May 19, 2023, the Debtors filed the *Notice of (I) Entry of Corrected and Amended Order (A) Approving the Second Amended Disclosure Statement and (B) Confirming the Third Amended Joint Plan of Voyager Digital Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code and (II) Occurrence of Effective Date* [Docket No. 1405], which provided notice that the effective date of the Plan occurred on May 19, 2023 (the “Effective Date”).

10. On the Effective Date, the Plan Administrator became the sole representative of the Wind-Down Debtor’s estates. [Docket No. 1166-1]. The Plan vested the Plan Administrator with the sole authority to reconcile, dispute, litigate, settle, compromise, or otherwise resolve any Disputed Claim. *Id.*

III. Claim Objection Deadline

11. Pursuant to the Plan, the deadline for the Plan Administrator to object to claims was November 15, 2023 (as extended, the “Claims Objection Deadline”). *See* Plan Art. VII § B. The Plan permits the Court to extend the Claims Objection Deadline in its discretion upon request by the Plan Administrator. *Id.*

12. On November 13, 2023, the Plan Administrator filed the *Motion of the Plan Administrator for Entry of an Order Extending the Deadline to Object to Proofs of Claim* [Docket No. 1610] (the “Initial Deadline Extension Motion”). On December 4, 2023, the Court entered an order granting the Initial Deadline Extension Motion, extending the Claims Objection Deadline to May 13, 2024, without prejudice to the right of the Plan Administrator to seek further extension of the Claims Objection Deadline.

13. On May 10, 2024, the Plan Administrator filed the *Motion of the Plan Administrator for Entry of an Order Extending the Deadline to Object to Proofs of Claim* [Docket No. 1677] (the “Second Deadline Extension Motion”). On June 10, 2024, the Court

entered an order granting the Second Deadline Extension Motion, extending the Claims Objection Deadline to December 5, 2024, without prejudice to the right of the Plan Administrator to seek further extension of the Claims Objection Deadline.

14. On November 26, 2024 the Plan Administrator filed the *Motion of the Plan Administrator for Entry of an Order Extending the Deadline to Object to Proofs of Claim* [Docket No. 1797] (the “Third Deadline Extension Motion”). On December 16, 2024, the Court entered an order granting the Third Deadline Extension Motion, extending the Claims Objection Deadline to June 3, 2025, without prejudice to the right of the Plan Administrator to seek further extension of the Claims Objection Deadline.

IV. The Claims Register and Reconciliation of Claims

15. Since the filing of the Third Deadline Extension Motion, the Plan Administrator and his professionals have made significant strides in the reconciliation of the approximately 13,096 proofs of claim (each, a “Proof of Claim” and collectively, the “Proofs of Claim”) that were filed against the Debtors. The Plan Administrator and his professionals have worked diligently to reconcile and resolve such claims through informal negotiations, mediation and, where necessary, omnibus claims objections. Such process is ongoing.

16. Specifically, the Wind-Down Debtor continues to serve as a member of the creditors’ committee in the insolvency proceeding of Three Arrows Capital, Ltd. (“Three Arrows Capital”). In that capacity, the Wind-Down Debtor continues to collaborate closely with the Joint Liquidators of Three Arrows Capital and other significant creditors to try to maximize the return to creditors in that proceeding.

17. Further, on December 26, 2024, BAM Trading Services Inc. d/b/a Binance.US (“Binance”) filed an adversary complaint³ against the Wind-Down Debtor seeking the return of a \$10 million earnest money deposit provided in connection with the Debtors’ sale to Binance contemplated in December 2022. The Wind-Down Debtor filed the *Defendants’ Answer, Affirmative Defenses, and Counterclaims*⁴ not only contesting Binance’s asserted right to recovery but also asserting counterclaims against Binance for breach of contract and fraud. The Wind-Down Debtor continues to zealously pursue such claims and will attend a mediation with Binance in early June.

18. On November 27, 2024, the Wind-Down Debtor filed a 53-count complaint against Metropolitan Commercial Bank (“MCB”), alleging, in part, that MCB bears responsibility for misleading statements made by Voyager to its brokerage customers. In addition to the lawsuit against MCB, the Wind-Down Debtor remains involved in various stages of investigation and litigation with respect to numerous causes of action. These recovery efforts will determine the amount and timing of potential recoveries for creditors of the Wind-Down Debtor.

19. Additionally, since the filing of the Third Deadline Extension Motion, the Plan Administrator and his professionals have resolved a number of claims through settlements stemming from avoidance action litigation. Over a period of several months, the Wind-Down Debtor conducted a thorough review of potentially avoidable and recoverable transfers, and sent demand letters to 215 parties requesting that such parties return a portion of the avoidable preference transfers. After filing over 75 individual lawsuits related to these preferential transfers, the Wind-Down Debtor has settled with 207 out of the 215 preference targets. The

³ Docket No. 1806.

⁴ Adv. Proc. 24-04049 at Docket No. 7 (Bankr. S.D.N.Y.).

Wind-Down Debtor is continuing negotiation efforts and/or seeking default judgments with respect to the remaining 8 lawsuits.

20. Although the Plan Administrator continues to make progress reconciling and resolving claims, this process will not be completed by the Claims Objection Deadline. Furthermore, given the uncertainty of future distributions for creditors Voyager Digital, Ltd. (“TopCo”) and Voyager Digital Holdings, Inc. (“HoldCo”), the Plan Administrator respectfully submits that estate resources should not yet be expended in connection with any claim objection process. Accordingly, given the uncertainty of any potential distributions for creditors of TopCo and HoldCo as well as the continued efforts by the Wind-Down Debtor to successfully recovery funds for the benefit of the estate, the Plan Administrator requests an extension of the Claims Objection Deadline from December 5, 2024 through and including June 3, 2025 (the “Extended Deadline”).

RELIEF REQUESTED

21. By this Motion, the Plan Administrator respectfully requests entry of an order, substantially in the form of the Proposed Order, extending the Claims Objection Deadline to the Extended Deadline, to allow additional time to reconcile and resolve all remaining claims and, to the extent necessary, file any required objections with this Court. The requested extension is without prejudice to the Plan Administrator’s right to seek additional extensions of the Claims Objection Deadline, as appropriate.

BASIS FOR RELIEF

22. Section 105(a) of the Bankruptcy Code provides that “the court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of the Bankruptcy Code.” 11 U.S.C. § 105(a).

23. Additionally, Bankruptcy Rule 9006(b) provides that: “when an act is required or allowed to be done at or within a specified period ... by order of the court, the court for cause shown may at any time in its discretion ... with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed”

24. Cause exists to extend the Claims Objection Deadline in these cases. The proposed extension is necessary for the efficient administration of the Wind-Down Debtor’s estates and is in the best interests of creditors. Granting the requested extension will provide the Plan Administrator with additional time to (i) finalize his review and analysis of claims against the estates, (ii) negotiate resolutions to those claims, where appropriate, and (iii) object to and potentially litigate claim disputes that cannot be consensually resolved.

25. The extension is not sought for the purposes of delay and will not prejudice any claimants. Conversely, if the Claims Objection Deadline is not extended, invalid or unsupported claims may be allowed, which may unfairly prejudice holders of valid and supported claims.

26. Accordingly, the Plan Administrator respectfully submits that the requested extension of the Claims Objection Deadline from June 3, 2025 to December 1, 2025 is appropriate.

NOTICE

27. The Plan Administrator will give notice of the Motion to the following parties: (a) the U.S. Trustee through the Court’s ECF system; (b) any party that has requested notice pursuant to Bankruptcy Rule 2002 through the Court’s ECF system, and (c) all creditors of the Wind-Down Debtor via electronic mail. In light of the nature of the relief requested, the Plan Administrator submits that no other or further notice need be given.

Dated: New York, New York
May 29, 2025

Respectfully submitted,

MCDERMOTT WILL & EMERY LLP

/s/ Darren Azman

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Counsel to the Plan Administrator

Exhibit A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,)	
)	Case No. 22-10943 (MEW)
Debtors. ¹)	
)	(Jointly Administered)

**ORDER GRANTING THE FOURTH MOTION OF THE PLAN
ADMINISTRATOR FOR ENTRY OF AN ORDER
EXTENDING THE DEADLINE TO OBJECT TO CLAIMS**

Upon the Motion (the “Motion”)² filed by the Plan Administrator seeking entry of an order (this “Order”) extending the deadline to object to claims, as more fully set forth in the Motion; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, entered January 31, 2012; and the Court having the power to 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 the Court having found that the Plan Administrator provided adequate and appropriate notice of the Motion under the circumstances; and the Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before the Court (the “Hearing”); and the Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.

¹ The Wind-Down Debtor in these chapter 11 cases consists of Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The service address and principal place of business is 51 JFK Parkway, First Floor West, Short Hills, NJ 07078.

² Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Motion.

2. The Claims Objection Deadline is hereby extended from June 3, 2025 through and including December 1, 2025, without prejudice to the right of the Plan Administrator to seek further extensions of the Claims Objection Deadline.

3. Notwithstanding any provision in the Bankruptcy Rules to the contrary, this Order shall be immediately effective and enforceable upon its entry.

4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: June __, 2025
New York, New York

THE HONORABLE MICHAEL E. WILES
UNITED STATES BANKRUPTCY JUDGE