

**REQUEST OF PLAN ADMINISTRATOR TO MYCONSTANT CUSTOMERS TO  
SUPPLY ADDITIONAL SUPPORTING DOCUMENTATION IN SUPPORT OF PROOF  
OF CLAIM AGAINST PRIME TRUST, LLC AND ITS AFFILIATED DEBTORS**

**PARTIES RECEIVING THIS REQUEST SHOULD LOCATE THEIR NAMES AND  
THEIR CLAIMS IDENTIFIED ON EXHIBIT 1 ATTACHED HERETO.**

**THE PLAN ADMINISTRATOR OF THE PRIME TRUST DEBTORS' BANKRUPTCY ESTATES HEREBY REQUESTS THAT THOSE CUSTOMERS OF CONST LLC (DBA MYCONSTANT) ("MYCONSTANT") WHO HAVE FILED PROOFS OF CLAIM AGAINST PRIME TRUST, LLC ("PRIME TRUST"), PRIME CORE TECHNOLOGIES, INC., PRIME IRA, LLC OR PRIME DIGITAL, LLC (COLLECTIVELY THE "DEBTORS"), AND WHOSE PROOFS OF CLAIM HAVE YET TO BE RESOLVED BY THE COURT, SUPPLEMENT THEIR PROOFS OF CLAIM BY PROVIDING THE PLAN ADMINISTRATOR WITH SUPPLEMENTAL DOCUMENTATION IN SUPPORT OF HIS/HER/THEIR CLAIM. SUCH SUPPLEMENTAL DOCUMENTATION MAY INCLUDE DOCUMENTS (I.E., BANK STATEMENTS, WIRE TRANSFER STATEMENTS, CREDIT CARD STATEMENTS, ELECTRONIC PAYMENT STATEMENTS) EVIDENCING YOUR DIRECT TRANSFER OF FUNDS TO THE PRIME TRUST DEBTORS.**

Province Fiduciary Services, LLC, as the Plan Administrator (the "Plan Administrator") appointed pursuant to the Debtors' confirmed Plan hereby files this request (this "Request") identifying certain claims (the "MyConstant Customer Claims") filed in the Debtors' pending chapter 11 bankruptcy cases at Case No. 23-11161 (JKS) in the United States Bankruptcy Court for the District of Delaware (the "Chapter 11 Cases")<sup>1</sup> related to such claimants' purported claims against the Debtors pursuant to such claimants' business relationships with MyConstant. A list of the MyConstant Customer Claims is attached hereto as Exhibit 1.<sup>2</sup> In further support of this Request, the Plan Administrator respectfully represents as follows:

**BACKGROUND**

1. On August 14, 2023 (the "Petition Date"), each of the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the District of Delaware (the "Court").

2. On September 20, 2023, the Court entered the *Order (I) Establishing Bar Dates to File Proofs of Claim; (II) Approving Form and Manner for Filing Proofs of Claim; (III) Approving*

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<sup>1</sup> A copy of the docket in the Debtors' Chapter 11 Cases is available free of charge at: <https://cases.stretto.com/primetrust/>

<sup>2</sup> If a MyConstant Claim was previously disallowed by the Court due to being a late-filed claim, such MyConstant Claim remains disallowed and is not identified herein.

*Form and Manner of Notice of Bar Dates; and (IV) Granting Related Relief* [Docket No. 169] (the “Bar Date Order”). The Bar Date Order established, among other deadlines, (i) October 22, 2023 as the deadline for each person or entity other than governmental units to file (a) proofs of prepetition claims, including administrative expense claims arising pursuant to section 503(b)(9) of the Bankruptcy Code (the “General Bar Date”), and (b) proofs of administrative expense claims arising on or after the Petition Date through September 15, 2023 (the “Administrative Bar Date”); and (ii) February 10, 2024 as the last date for governmental units to file proofs of claim that arose before the Petition Date (the “Governmental Bar Date”).

3. On September 22, 2023, the Debtors filed notices of the General Bar Date, Administrative Bar Date and Governmental Bar Date. *See* Docket Nos. 185, 186.

4. On December 14, 2023, the Debtors filed the *Amended Joint Chapter 11 Plan of Reorganization for Prime Core, Inc. and its Affiliated Debtors* [Docket No. 592], as amended (the “Plan”),<sup>3</sup> which was confirmed on December 21, 2023. *See* Docket No. 644. The Plan became effective on January 5, 2024 (the “Effective Date”). *See* Docket No. 694.

5. Pursuant to the Plan, the Plan Administrator is the manager of the Wind-Down Debtor, vested with the powers of a debtor in possession and trustee under sections 1107, 1123(b)(3), 704, and 1106 of the Bankruptcy Code, and is authorized to implement the Plan, empowered with all rights and defenses to claims filed against the Debtors’ estates. *See* Plan, Art. 6.10(a), (c), (d), Art. 8.7; *see also* Docket No. 644, ¶ Q(d).

6. Since the Effective Date, the Plan Administrator has, among other tasks, been reconciling claims scheduled by, and filed against, the Debtors.

### **THE MYCONSTANT CLAIMS**

7. Prior to the Petition Date, the Debtors had a business relationship with MyConstant as an integrator. The Debtors’ books and records reflect that as of the Petition Date of August 14, 2023, MyConstant’s account with Debtor Prime Trust reflected a balance of \$328,052 (the “MyConstant Scheduled Claim”).<sup>4</sup>

8. In contrast to Debtors’ books and records, MyConstant filed a claim against Debtor Prime Trust asserting a claim in the amount of no less than \$1,088,326.00 plus attorneys’ fees and costs (the “MyConstant Proof of Claim”).

9. In addition to the MyConstant Proof of Claim, certain customers of MyConstant (the “MyConstant Customers”) filed various proofs of claims against the Debtors (*i.e.*, the MyConstant Customer Claims). The MyConstant Customer Claims assert claims against the Debtors (primarily, Debtor Prime Trust) relating to money/funds/cryptocurrency allegedly paid by

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<sup>3</sup> The *Amended Joint Chapter 11 Plan of Reorganization for Prime Core, Inc. and its Affiliated Debtors*, dated December 14, 2023 [Docket No. 592], as modified by the Initial Plan Supplement [Docket No. 486], the First Amended Plan Supplement [Docket No. 511], the Second Amended Plan Supplement [Docket No. 540], the Third Amended Plan Supplement [Docket No. 594], the Fourth Amended Plan Supplement [Docket No. 615], and the Fifth Amended Plan Supplement [Docket No. 620] (collectively with the exhibits thereto, the “Plan”).

<sup>4</sup> The Debtors also scheduled MyConstant with two additional claims, in the amount of \$120,000 and undetermined, with such claims being designated as contingent, unliquidated and disputed.

or transferred from the MyConstant Customers to MyConstant or the Debtors. The Plan Administrator has determined that over 100 MyConstant Customers have filed proofs of claims against the Debtors' bankruptcy estates, asserting claims in the amount of no less than \$5,900,000 (plus 29 claims that asserted unliquidated amounts).

10. The Plan Administrator has determined that the MyConstant Customer funds deposited with MyConstant were not consistently transferred to the Debtors by MyConstant or the MyConstant Customers. Additionally, the Debtors did not maintain segregated accounts for MyConstant Customers. Moreover, certain MyConstant Customers assert, through their proofs of claims, that they directly transferred money/funds/cryptocurrency payable to MyConstant directly to the Debtors. Accordingly, the Debtors' books and records lack confirmatory evidence of: (i) the amount of "Custodial Property" allegedly held by Debtor Prime Trust, as asserted in the MyConstant Proof of Claim; or (ii) the amount allegedly transferred by the MyConstant Customers to the Debtors as alleged in the MyConstant Customer Claims.

11. Stated simply, MyConstant asserts Debtor Prime Trust held certain of MyConstant's "Custodial Property" (as defined in the MyConstant Proof of Claim), while certain of the MyConstant Customers also assert they transferred funds to the Debtors.

12. In the coming weeks, the Plan Administrator intends to file an omnibus objection to the MyConstant Proof of Claim and MyConstant Customer Claims that have yet to be ruled upon by the Court to date (the "Omnibus Objection to MyConstant Claims").

13. In an effort to resolve the MyConstant Proof of Claim and MyConstant Customer Claims not previously ruled upon by the Court, the Plan Administrator is serving this *Request of Plan Administrator to MyConstant Customers to Supply Additional Supporting Documentation in Support of Proof of Claim Against Prime Trust, LLC and its Affiliated Debtors* on MyConstant and the MyConstant Customers whose proofs of claims have not otherwise been ruled upon by the Court.

**OPPORTUNITY TO SUPPLEMENT MYCONSTANT PROOF OF CLAIM AND  
MYCONSTANT CUSTOMER CLAIMS WITH SUPPORTING DOCUMENTATION**

14. **BY THIS REQUEST, THE PLAN ADMINISTRATOR IS PROVIDING MYCONSTANT AND MYCONSTANT CUSTOMERS WHO HAVE FILED PROOFS OF CLAIMS AGAINST THE DEBTORS, AND WHOSE PROOFS OF CLAIMS HAVE YET TO BE RESOLVED BY THE COURT, AN OPPORTUNITY TO SUPPLEMENT HIS/HER/THEIR PROOFS OF CLAIM BY PROVIDING THE PLAN ADMINISTRATOR WITH SUPPLEMENTAL DOCUMENTATION IN SUPPORT OF HIS/HER/THEIR CLAIM. SUCH SUPPLEMENTAL DOCUMENTATION MAY INCLUDE DOCUMENTS (I.E., BANK STATEMENTS, WIRE TRANSFER STATEMENTS, CREDIT CARD STATEMENTS, ELECTRONIC PAYMENT STATEMENTS) EVIDENCING YOUR DIRECT TRANSFER OF FUNDS TO THE DEBTORS.**

15. THE MYCONSTANT PROOF OF CLAIM AND MYCONSTANT CUSTOMER CLAIMS THAT RELATE TO THIS REQUEST ARE IDENTIFIED ON **EXHIBIT 1** HERETO.

16. The Plan Administrator respectfully requests that each holder of the MyConstant Proof of Claim or MyConstant Customer Claims identified on Exhibit 1 review their filed Claim and send supplemental documentation in support of their Claim on or before December 5, 2025 (the “Response Deadline”) through the secure submission portal at <https://forms.stretto.com/>. To the extent a holder is unable to submit its supplemental information through the electronic portal, the holder should email [TeamPrimeCore@stretto.com](mailto:TeamPrimeCore@stretto.com) on or before the Response Deadline. Such supporting documentation should include specific evidence of transfers from such holder to the Debtors directly (e.g., a copy of the holder’s bank statement, wire transfer statement, credit card statement, or electronic payment statement evidencing a transfer in the amount of the holder’s MyConstant Proof of Claim or MyConstant Customer Claim to Prime Trust’s or any of the other Debtors’ account). The Plan Administrator intends to review such supplemental documentation to determine whether the MyConstant Proof of Claim or MyConstant Customer Claim is validity asserted against the Debtors. If the Plan Administrator determines that such MyConstant Proof of Claim or MyConstant Customer Claim is not a claim against the Debtors, the Plan Administrator intends to file the Omnibus Objection to MyConstant Claims to disallow or reduce such claims—which objection will be served upon each affected claimant with an additional opportunity for the claimant to respond.

17. To the extent a holder of the MyConstant Proof of Claim or MyConstant Customer Claims has questions about its Claim(s) or this Request, it should contact undersigned counsel to the Plan Administrator.

### **RESERVATION OF RIGHTS**

18. The Plan Administrator reserves any and all rights to amend, supplement or otherwise modify this Request and to file additional requests or notices of this nature with respect to any and all claims filed in these Chapter 11 Cases. The Plan Administrator also reserves any and all rights, claims, and defenses with respect to any and all of the MyConstant Proof of Claim and MyConstant Customer Claims (including the right to object to such claims), and nothing included in or omitted from this Request shall impair, prejudice, waive or otherwise affect any such rights, claims and defenses.

Dated: November 21, 2025  
Wilmington, Delaware

**WOMBLE BOND DICKINSON (US) LLP**

*/s/ Donald J. Detweiler*

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*Counsel to the Plan Administrator*

**EXHIBIT 1**

**MyConstant Proof of Claim and MyConstant Customer Claims**

Claim #	Creditor Name	Asserted Admin Priority Claim Amount	Asserted Secured Claim Amount	Asserted Priority Claim Amount	Asserted General Unsecured Claim Amount	Total Filed Claim Amount
28		-	Blank	-	-	-
42		-	-	-	4,731	4,731
45		1,890	-	-	19,875	21,765
46		-	-	-	90,000	90,000
189		-	227,044	-	-	227,044
239		-	-	-	14,058	14,058
240		-	-	-	191,251	191,251
241		-	-	-	2,414	2,414
253		-	-	-	11,773	11,773
274		-	-	-	27,001	27,001
281		-	-	-	Unliquidated	-
283		-	-	-	23,477	23,477
284		-	-	-	25,403	25,403
286		-	-	-	15,805	15,805
287		-	-	-	168,708	168,708
310		-	-	-	Unliquidated	-
314		-	-	-	960,000	960,000
315		-	-	-	6,560	6,560
318		-	-	-	9,557	9,557
319		-	-	-	329,808	329,808
321		-	-	-	22,610	22,610
323		-	-	-	Unliquidated	-
324		-	-	-	49,757	49,757
325		-	-	-	94,583	94,583
326		-	-	-	22,833	22,833
329		-	-	-	7,769	7,769
337		-	-	-	Unliquidated	-
340		-	-	-	10,515	10,515
347		-	-	-	Unliquidated	-
348		-	-	-	Unliquidated	-
349		-	-	-	40,606	40,606
350		-	-	-	28,678	28,678
354		-	-	-	17,142	17,142
356		-	-	-	20,524	20,524
360		-	-	-	Unliquidated	-
361		-	-	-	Unliquidated	-
362		-	-	-	7,383	7,383
363		-	-	-	260,202	260,202

Claim #	Creditor Name	Asserted Admin Priority Claim Amount	Asserted Secured Claim Amount	Asserted Priority Claim Amount	Asserted General Unsecured Claim Amount	Total Filed Claim Amount
365		-	-	-	12,434	12,434
368		-	-	-	14,522	14,522
372		-	-	-	55,155	55,155
374		-	-	-	Unliquidated	-
375		-	-	-	21,085	21,085
376		-	-	-	117,641	117,641
377		-	-	-	92,513	92,513
378		-	-	-	34,207	34,207
382		-	-	-	Unliquidated	-
383		-	-	-	9,346	9,346
387		-	-	-	5,350	5,350
389		-	-	-	Unliquidated	-
417		-	-	-	28,933	28,933
419		-	-	-	32,000	32,000
424		-	-	-	Unliquidated	-
435		-	-	-	118,984	118,984
447		-	-	-	23,632	23,632
461		-	-	-	Unliquidated	-
467		-	-	-	2,357	-
468		-	-	-	6,897	6,897
470		-	-	-	35,926	35,926
471		-	-	-	Unliquidated	-
472		-	-	-	Unliquidated	-
479		-	-	-	Unliquidated	-
503		-	-	-	Unliquidated	-
506		-	-	-	Unliquidated	-
556		-	-	-	6,588	6,588
562		-	-	-	60,208	60,208
574		-	-	-	Unliquidated	-
580		-	-	-	4,686	4,686
585		-	-	-	78,953	78,953
587		-	-	-	Unliquidated	-
588		-	-	-	49,608	49,608
610		-	-	-	358,317	358,317
616		-	-	-	Unliquidated	-
635		-	-	-	Unliquidated	-
636		-	-	-	Unliquidated	-
638		-	-	-	25,261	25,261

Claim #	Creditor Name	Asserted Admin Priority Claim Amount	Asserted Secured Claim Amount	Asserted Priority Claim Amount	Asserted General Unsecured Claim Amount	Total Filed Claim Amount
669	[REDACTED]	-	-	-	35,121	35,121
763	[REDACTED]	-	-	-	15,431	15,431
767	[REDACTED]	-	-	-	Unliquidated	-
801	[REDACTED]	-	-	-	Unliquidated	-
814	[REDACTED]	-	-	-	Unliquidated	-
816	[REDACTED]	-	-	-	Unliquidated	-
872	[REDACTED]	-	-	-	48,000	48,000
876	[REDACTED]	-	-	-	196,508	196,508
961	Const LLC	-	-	-	1,088,326	1,088,326
1096	[REDACTED]	-	-	-	15,710	15,710
1169	[REDACTED]	-	-	-	43,458	43,458
1170	[REDACTED]	-	-	-	25,148	25,148
1201	[REDACTED]	-	-	-	33,000	33,000
1328	[REDACTED]	-	-	-	44,647	44,647
1344	[REDACTED]	-	-	-	32,334	-
1381	[REDACTED]	-	-	-	62,866	62,866
1385	[REDACTED]	-	-	-	20,876	20,876
1422	[REDACTED]	-	-	-	42,519	42,519
1423	[REDACTED]	-	-	-	Unliquidated	-
1425	[REDACTED]	-	-	-	25,038	25,038
1432	[REDACTED]	-	-	-	53,318	53,318
1433	[REDACTED]	-	-	-	48,854	48,854
1436	[REDACTED]	-	-	-	Unliquidated	-
1468	[REDACTED]	-	-	-	67,465	67,465
1766	[REDACTED]	-	-	-	122,659	122,659
1799	[REDACTED]	-	-	-	20,456	20,456