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

In re:	Chapter 11
BITCOIN DEPOT INC., *et al.*,	Case No. 26-90528 (CML)
	(Jointly Administered)
Debtors.[1]	**Ref. Docket No. 305, 318**

STATEMENT AND RESERVATION OF RIGHTS OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO THE DEBTORS' COMBINED DISCLOSURE STATEMENT AND CHAPTER 11 PLAN OF LIQUIDATION

The Official Committee of Unsecured Creditors (the "Committee") of Bitcoin Depot Inc. and its debtor affiliates in the above-captioned chapter 11 cases (collectively, the "Debtors"), by and through its undersigned proposed counsel, hereby submits this statement and reservation of rights with respect to (a) the *Debtors' First Amended Combined Disclosure Statement and Chapter 11 Plan of Liquidation* [Docket No. 318] (the "Combined Disclosure Statement and Plan") and (b) the *Debtors' Emergency Motion for Entry of an Order (I) Scheduling a Combined Hearing; (II) Establishing Objection Deadlines; (III) Approving the Solicitation Materials and Tabulation Procedures; (IV) Conditionally Approving the Disclosure Statement; and (V) Granting Related Relief* [Docket No. 305] (the "Solicitation Procedures Motion").[2]

1 The Debtors in these Chapter 11 Cases (as defined herein) and the last four digits of their respective federal tax identification numbers (if applicable) may be obtained on the website of the Debtors' proposed claims and noticing agent at https://restructuring.ra.kroll.com/bitcoindepot. The location of the Debtors' corporate headquarters is: 8601 Dunwoody Place, Sandy Springs, Georgia 30350.

2 Capitalized terms used but not immediately defined herein shall have the meanings given to them in the Combined Disclosure Statement and Plan, Solicitation Procedures Motion, or as otherwise defined herein, as applicable.

STATEMENT AND RESERVATION OF RIGHTS

1. The Committee and Debtors agree that time is of the essence in these cases. With no post-petition operations, the Debtors have a limited window of sufficient liquidity to confirm a chapter 11 plan and transfer its remaining assets to a Liquidation Trust for the benefit of general unsecured creditors. Accordingly, the Committee supports the Debtors' request to begin soliciting the Combined Disclosure Statement and Plan.

2. While soliciting the Combined Disclosure Statement and Plan is a key milestone in these cases, additional work remains ahead. Importantly, the extent to which the Debtors will provide releases remains subject, in part, to the Investigation Subcommittee's findings. The Committee understands those findings should be filed in advance of the Plan Supplement deadline of July 16. While the Investigation Subcommittee and its advisors have been cooperative in sharing information with the Committee, the Committee does not know the extent to which the Investigation Subcommittee will recommend that the Debtors release third parties. Accordingly, the Committee reserves all rights with respect to those findings and whatever Plan modifications the Debtors seek to implement thereafter.

3. The Committee's view is that the Debtors should be releasing very few (if any) third parties pursuant to the Plan. Here, the only basis for distributions to unsecured creditors will be the successful monetization of preserved causes of action. The Committee believes that the Liquidation Trustee—not the Debtors—should determine which estate causes of action should and should not be pursued. Put simply, the Committee feels strongly that the Debtors should craft their list of proposed Released Parties using a light touch and not seek to push through broad releases that the Committee does not support and will oppose at the confirmation hearing. The Committee has been exceedingly practical considering the budgetary and temporal constraints in these cases

and fully expects the Debtors to be as well in their approach to Plan releases. Indeed, such an approach would be consistent with the Debtors' statements in the First Day Declaration where the Debtors noted that they "intend to use the chapter 11 process to effectuate these asset sales and to establish a liquidation trust for the benefit of their stakeholders, with the aim of monetizing their assets and maximizing recovery to all stakeholders."[3] The Committee believes the simplest way to maximize recoveries is to maximize the number of causes of action being preserved. To that end, it is worth noting that the Committee's own investigation to date has identified several transactions involving former members of management that should not be subject to any Plan releases.

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[3] *See Declaration of Thomas Studebaker in Support of the Chapter 11 Cases and First Day Motions* [Docket No. 23] (the "First Day Declaration") at ¶ 40.

Houston, Texas
Dated: June 23, 2026

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Certificate of Service

I certify that on June 23, 2026, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ *Jennifer J. Hardy*
Jennifer J. Hardy