

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

In re:

SiFi Networks America, LLC,

Debtor.¹

Chapter 11

Case No. 26-10912 (BLS)

Related to Docket Nos. 65 and 81

**SECOND SUPPLEMENTAL DECLARATION OF
JACEN A. DINOFF IN SUPPORT OF DEBTOR'S APPLICATION FOR
AN ORDER AUTHORIZING (I) THE EMPLOYMENT AND RETENTION OF KCP
ADVISORY GROUP LLC TO PROVIDE A CHIEF RESTRUCTURING OFFICER AND
ADDITIONAL PERSONNEL FOR THE DEBTOR AS OF THE PETITION DATE
AND (II) APPROVING THE ENGAGEMENT AGREEMENT RELATING THERETO**

I, Jacen A. Dinoff, hereby declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury that the following is true to the best of knowledge, information, and belief:

1. I am the Chief Executive Officer of KCP Advisory Group LLC ("KCP"). I have worked at KCP since 2008. As part of my duties with KCP, I served as the Chief Restructuring Officer ("CRO") for the above-captioned debtor and debtor in possession (the "Debtor") through June 29, 2026. I served in that capacity since May 9, 2026, and I am familiar with the Debtor's business and financial affairs.

2. I submit this second supplemental declaration (the "Second Supplemental Declaration") in further support of the *Debtor's Application for an Order Authorizing (I) the Employment and Retention of KCP Advisory Group LLC to Provide a Chief Restructuring Officer*

¹ The Debtor in this chapter 11 case and the last four digits of its federal tax identification number are SiFi Networks America, LLC (7990). The Debtor's service address in this chapter 11 case is 103 Foulk Road, Suite 500, Wilmington, DE 19803.

and Additional Personnel for the Debtor as of the Petition Date and (II) Approving the Engagement Agreement Relating Thereto [Docket No. 65] (the “Application”).²

3. On June 5, 2026, the Debtor filed a petition with this Court under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).

4. On June 10, 2026, the Debtor filed the Application pursuant to sections 105(a), 363(b), and 503(c) of the Bankruptcy Code.

5. My original declaration in support of the Application (the “Original Declaration”) was attached to the Application as Exhibit C.

6. On June 17, 2026, the Debtor filed a supplemental declaration in support of the Application [Docket No. 65] (the “Supplemental Declaration”)

7. Except as otherwise indicated this Supplemental Declaration, all facts stated in this Supplemental Declaration are based on personal knowledge, my discussions with members of the Debtor’s senior management and advisors, my review of relevant documents or, based on my experience and knowledge of the Debtor’s operations and financial conditions, my opinion. If I were called to testify as a witness in this matter, I would testify competently to the facts set forth herein.

ADDITIONAL DISCLOSURES

8. Following the filing of the Supplemental Declaration, I learned from Squire Patton Boggs LLP (“SPB”) that although Katherine Catanese, my romantic partner, had a limited role in representing Generate Capital (“Generate”) adverse to the Debtor, she since has been “walled off” from that representation. To the extent that anyone at the Debtor or KCP reasonably believes that the wall has been compromised or removed or that there is any change in SPB’s treatment of this

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Application or the Original Declaration (as defined herein), as applicable.

matter, both KCP and the Debtor will promptly file a supplemental declaration with the Court informing parties of same.

9. Neither SPB, any SPB attorneys, nor Generate has filed a notice of appearance in this chapter 11 case, and, to my knowledge, they currently are not taking an active role in the case. Additionally, to my knowledge, the Office of the General Counsel of SPB has instructed Ms. Catanese not to discuss the Generate matter with me and Ms. Catanese and I have not discussed this chapter 11 case in any capacity.

10. In connection with the foregoing, KCP and the Debtor also has taken steps to replace me as CRO with Marjorie Kaufman of KCP. I resigned as CRO effective as of Monday, June 29, 2026. Ms. Kaufman was appointed as CRO the same day. A revised proposed order approving the Retention Application and reflecting the new CRO currently is being discussed with the Office of the United States Trustee for the District of Delaware.

DISINTERESTEDNESS

11. To the best of my knowledge, information, and belief, insofar as I have been able to ascertain after reasonable inquiry, neither I nor any of KCP's professional employees (a) have any connection with the Debtor, its creditors, the U.S. Trustee, any other Potentially Interested Parties in this Chapter 11 Case, or its respective attorneys or accountants, or (b) are related or connected to any United States Bankruptcy Judge for the District of Delaware, any of the District Judges for the District of Delaware who handle bankruptcy cases, the U.S. Trustee, or any employee in the Office of the U.S. Trustee, except as may be disclosed in the Original Declaration, the Supplemental Declaration or this Second Supplemental Declaration.

12. If KCP discovers any additional information that requires disclosure, KCP will file promptly a supplemental declaration with the Court.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief.

Billerica, Massachusetts

Date: June 30, 2026

/s/ Jacen A. Dinoff
Jacen A. Dinoff