

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS – HOUSTON DIVISION

IN RE LINQTO TEXAS, LLC, et al.,  
Debtors.

CASE Nos. 25-90186 THROUGH 25-90189 (Jointly Administered)  
Hon. Alfredo R. Perez, United States Bankruptcy Judge

Submitted via Email (Pro Se Filing) and served on Parties in Interest  
SCHWARTZ PLLC  
601 East Bridger Avenue  
Las Vegas, NV 89101  
Email: saschwartz@nvfirm.com

United States Courts  
Southern District of Texas  
FILED

AUG 18 2025

Nathan Ochsner, Clerk of Court

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NOTICE OF PRESERVATION OF RIGHTS AND CONDITIONAL OBJECTION TO CLASSIFICATION OF  
UNITHOLDERS AS CREDITORS

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**A. INTRODUCTION**

This correspondence is submitted by Mr (Herbert) Gavin Solomon an Australian citizen and full-time resident of Australia ("**Notifier**") in connection with the above-captioned Chapter 11 proceedings ("**Chapter 11 Case**") currently pending before the United States Bankruptcy Court.

The Notifier submits this Notice to preserve all rights, raise conditional objections and provide commentary regarding the classification and treatment of unitholders in the Chapter 11 Case.

The Notifier expressly reserves the right to submit supplemental pleadings, objections or other filings.

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**B. BACKGROUND**

1. The Debtor, Linqto Texas LLC ("**Linqto Texas**") filed for Chapter 11 bankruptcy protection on July 7, 2025.
2. One of the related entities of the Notifier is a common stock shareholder of the parent company of Linqto Texas namely Linqto Inc. (a Delaware Company) ("**Linqto Inc**") since January 2019.
3. For the purposes of this Notice, the term "**Linqto**" refers collectively and individually to Linqto Texas LLC, Linqto Inc., Linqto Liquidshares LLC, and Linqto Manager LLC.
4. Another related entity of the Notifier is a unitholder of Linqto.
5. Linqto operated an investment platform that enabled investors to purchase/subscribe for member interests ("**Units**") in special purpose vehicles ("**SPVs**") (the holders/owners of Units

being called "Unitholders") that held shares in pre-IPO companies. The Notifier understands that there are some 13,500 Unitholders who collectively subscribed for some \$460M of Units.

6. In the filing by Linqto in the Bankruptcy Court dated July 7<sup>th</sup>, 2025 Linqto stated in section 14 that it had estimated creditors of "10,001-25,000" and in section 16 it had liabilities of "\$500,000,001-\$1 billion" – as such Linqto's filing appears to imply that all Unitholders are being treated as Creditors of Linqto.
7. This Notice is submitted subject to the Good Faith Rider set forth below.

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#### C. SUMMARY OF OBJECTION – CLASSIFICATION OF UNITHOLDERS

8. Unitholders should NOT be treated or classified as "creditors" of Linqto. Instead, they are equity holders or security holders.
9. Unitholders do not hold bona fide claims against Linqto that would entitle them to creditor status under the Bankruptcy Code.
10. As no legitimate debts are owed by Linqto to these parties, the inclusion of Unitholders as creditors may call into question the appropriateness of the Chapter 11 filing. Such classification, if unjustified, may artificially inflate creditor numbers and misrepresent the financial distress required for Chapter 11 protection.
11. Unitholders are not eligible for appointment to the Official Committee of Unsecured Creditors.

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#### D. NATURE OF UNITHOLDER INTERESTS

12. Each investor subscribing for Units entered into a Limited Liability Company Operating Agreement with Linqto (the "Operating Agreement") and was admitted as a Member of Linqto, thereby becoming a Unitholder.
13. Each Unitholder contributed 100% of their subscription funds at the time of admission and were bound by the terms of the Operating Agreement.
14. Under the Operating Agreement:
  - a. Distributions to Unitholders, in cash or in kind, are solely at Linqto's discretion.
  - b. Linqto retained full discretion as to the timing and form of any distributions in cash, securities or other property to Unitholders.
  - c. Units held by Unitholders are transferable.
15. Linqto made no promise of cash redemption or repayment to Unitholders, other than under discretionary circumstances.

16. As of **July 7, 2025** (the petition date) the Notifier believes that:

- a. Linqto had purchased all the underlying pre-IPO stock required for Unitholders in the SPVs and that pre-IPO stock all remains registered in the name of Linqto.
- b. No amounts were owed by Linqto to Unitholders.
- c. No distributions to Unitholders of shares, cash, or property were outstanding (other than the \$18.8M Ripple disputed cash).
- d. No redemption rights for Unitholders existed or had matured.
- e. No contractual obligation required Linqto to return investments to Unitholders.
- f. No basis for Unitholder claims under 11 U.S.C. § 101(10) existed.
- g. There were no fixed, enforceable or matured obligations on Linqto to pay monies to Unitholders which is the core requirement to be classified as a "*creditor*" under 11 U.S.C. § 101(10).
- h. There was no entitlement for any Unitholders to seek return of investment, rescission or compensation due to inability of Linqto to liquidate securities.
- i. Linqto had completed approximately 8 to 10 prior liquidity events involving IPOs or other realizations of underlying securities held by the SPVs with distributions in specie by Linqto to the respective Unitholders.

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**E. BASIS FOR SUBORDINATION UNDER § 510(b)**

- 17. Under 11 U.S.C. § 101(10) a "*creditor*" must have a right to payment, whether fixed, contingent, matured, or otherwise.
  - 18. Even if any Unitholder asserts claims as creditors, they must be subordinated under 11 U.S.C. § 510(b) because such claims arise from:
    - a. The purchase of securities issued by Linqto; or
    - b. Alleged damages arising from such equity investments.
  - 19. 11 U.S.C. § 510(b) of the Bankruptcy Code mandates that claims arising from the purchase of a security be subordinated to all general unsecured claims and to prevent investors from converting failed equity risk into parity with trade and operational creditors.
  - 20. U.S. Courts consistently interpret 11 U.S.C. § 510(b) to prevent investors from gaining parity with true creditors when they assumed equity risk.
-

**F. OBJECTION TO CLASSIFICATION OF UNITHOLDERS AS CREDITORS**

21. The Notifier objects to any attempt to characterize Unitholders as general unsecured creditors and reserves all rights in that regard.
  22. Specifically, the Notifier objects to:
    - a. The recharacterization of equity as debt.
    - b. Any plan, disclosure, or process that treats Unitholders as creditors.
    - c. Disparate treatment of equity holders through misclassification.
    - d. Any involuntary waiver or release of shareholder rights without due process including any involuntary conversion of equity claims into impaired classes under any plan.
  23. The Notifier reserves all rights under the Bankruptcy Code and applicable non-bankruptcy law, including, without limitation:
    - a. The right to object to any plan of reorganization, classification scheme, or proposed distribution.
    - b. The right to assert and maintain equity status.
    - c. The right to challenge proofs of claim based on recharacterization of equity interests.
    - d. The right to seek appellate relief.
    - e. The right to participate as a party-in-interest under 11 U.S.C. § 1109(b).
- 

**G. UNITHOLDERS TO BE TREATED FAIRLY**

24. Classifying Unitholders as creditors may result in limiting their recoveries to the return of original investment thereby stripping them of any upside potential in the underlying pre-IPO shares.
  25. It is in the interest of fairness and equity that Unitholders retain their classification as equity holders so that they may benefit from any increase in value of the underlying securities.
  26. The Notifier submits that any reclassification appears to disproportionately benefit Linqto and could be perceived as a strategic misuse of Chapter 11.
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**H. REGULATORY CONSIDERATIONS - SEC VIEW**

27. The Notifier believes that U.S. regulatory authorities, including the SEC, are likely to view Unitholders as equity holders rather than creditors which would support broader investor protections and enforcement scope.

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**I. UNITHOLDERS ARE NOT ELIGIBLE FOR THE CREDITORS COMMITTEE**

28. Unitholders do not qualify for appointment to the Official Committee of Unsecured Creditors under 11 U.S.C. § 1102(b)(1).
29. 11 U.S.C. § 1102(b)(1) clearly excludes equity holders from Unsecured Creditors Committee eligibility
30. The Notifier expressly reserves the rights to challenge any appointment Unitholders to the Creditors Committee on the grounds:
  - a. Lack of eligibility.
  - b. Conflict of interest.
  - c. Procedural deficiencies.
  - d. Misrepresentation of creditor status.

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**J. CHALLENGE TO CHAPTER 11 ELIGIBILITY**

31. In relation to Chapter 11 matters as at 7<sup>th</sup> July 2025 the Notifier believes that:
  - a. Linqto had cash at bank and liquid assets of over US\$20M (excluding the \$18.8M Ripple disputed cash) with minimal creditors if one excluded Unitholders as creditors.
  - b. Linqto was able to pay its debts as and when they fell due if Unitholders were classified as equity holders rather than as creditors.
  - c. A number of Linqto trade creditors listed in the Chapter 11 are parties involved/acting for Linqto in relation to the ill-fated US\$700M SPAC merger transaction of April-September 2024 ("**SPAC Transaction**") including but not limited to its lawyers, accountants, auditors and the like and all of these debts may have been subject to dispute or challenge by Linqto noting Linqto had expended in CY2024 some US\$9.6M out of pocket expenses in relation to the SPAC Transaction.
  - d. Based on good faith belief and review of publicly available information there were significant regulatory and legal concerns existing at the outset of the SPAC Transaction in April 2024 that may have rendered success unlikely as any form of proper due diligence would have disclosed fatal errors to any form of IPO or public offering of Linqto.
  - e. Linqto may have significant potential recovery opportunities against former executives, board members, lawyers, auditors, broker-dealers and other professionals for fiduciary breaches, regulatory missteps or financial misrepresentations. Such recoveries could materially benefit true creditors and equity holders alike including, without limitation:

- i. Clawback - the Notifier believes that certain cash bonuses may have been calculated based on inaccurate or misstated financial information relating to how cash bonus payments were calculated and paid to some Board Members, Management and employees since 2020 in the order of many \$millions e.g. former CEO William Sarris was paid some US\$3.6M cash bonus in CY2024 alone.
- ii. Lawyers – potential legal claims may exist against outside counsel who acted for Linqto since 2020 and, in particular, in relation to the establishment, operation and regulatory compliance of the SPVs and the SPAC Transaction.
- iii. Auditors – signing off the CY2022 and CY2023 financial reports without possible due diligence.
- iv. Broker-dealers acting for Linqto in relation to the SPAC transaction – potential due diligence negligence plus possible improper advice due in part to conflict of interest as promoters of the SPAC.
- v. Individuals who may be subject to regulatory scrutiny or enforcement under SEC or FINRA rules being potentially against some Board and past Management members.
- vi. Past Board members for matters such as possible fraud, misrepresentation, breach of fiduciary duty and/or breach of loyalty to shareholders and the like.
- vii. Current Board members for matters such as possible misstatements to the Court, breach of fiduciary duty and/or breach of loyalty to shareholders, shareholder harm, procedural abuse and the like.

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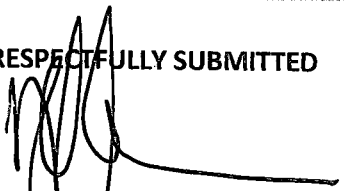
**K. RIDER - GOOD FAITH AND RESERVATION OF RIGHTS**

- 32. The Notifier affirms that this Notice is submitted in good faith based on publicly available information.
- 33. This Notice shall not constitute a waiver of jurisdictional rights and no inference should be drawn regarding the Notifier's submission to the Court's jurisdiction.
- 34. All statements herein are made pursuant to 11 U.S.C. §§ 510(b), 101(10), and 109(d), and are grounded in a good faith belief that classification and subordination may be improperly applied to Unitholders.
- 35. The Notifier respectfully requests that no sanctions, costs or fees be imposed in response to this Notice, as it is brought in good faith to preserve equity holder rights.
- 36. The Notifier respectfully submits that this Notice is based solely on publicly available information, personal knowledge and a good faith review of relevant materials and without legal counsel in the U.S. or Australia. No representation is made as to the completeness or

accuracy of third-party information. The Notifier does not seek to assert legal claims or allegations against any person or entity through this Notice, and expressly disclaims any intent to do so.

---

**RESPECTFULLY SUBMITTED**



**H Gavin Solomon**

37 Kells Creek Road Woodlands New South Wales Australia 2575

Email: [gs@larpagroup.com](mailto:gs@larpagroup.com)

Phone: +61 412 978777

**DATED:** August 3, 2025 (Australian Eastern Standard Time)

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**CERTIFICATE OF SERVICE**

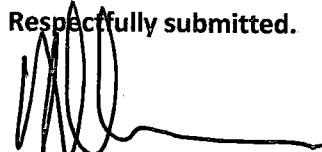
I hereby certify that on August 3, 2025 (Australian Eastern Standard Time), I caused a true and copy of the foregoing Notice to be served via electronic mail to each of the following parties (see attached):

<b>PARTY</b>	<b>NAME</b>	<b>EMAIL</b>
<b>United States Bankruptcy Judge Alfredo R Perez</b>	Case Manager	tyler_laws@txs.uscourts.gov
<b>United States Bankruptcy Court for the Southern District of Texas</b>	Pro Se Filing Email (for non-attorneys)	sdtx_bankruptcy_prose@txs.uscourts.gov
<b>EPIQ Case Management</b>	Claims and Case Administrator	LinqtoInfo@epiqglobal.com
<b>Debtors' Counsel</b>	Schwartz PLLC	ghammm@nvfirm.com
<b>United States Trustee</b>	US Trustee, Region 7	ha.nguyen@usdoj.gov
<b>California Attorney General</b>	Consumer Protection Section – Bankruptcy Notices	piu@doj.ca.gov
<b>Securities and Exchange Commission</b>	Alan Maza, Senior Bankruptcy Counsel	mazaa@sec.gov
<b>Counsel for Lender</b>	Faegre Drinker Biddle & Reath LLP	michael.stewart@faegredrinker.com
<b>Additional Debtors' Counsel</b>	Sullivan & Cromwell LLP	blasse@sullcrom.com
<b>Counsel for Official Committee of Unsecured Creditors</b>	Brown Rudnick LLP	spalley@brownrudnick.com
<b>Counsel for Sapien Group USA, LLC</b>	Leech Tishman Robinson Brog PLLC	jdercole@leechtishman.com

I declare that the foregoing is true and correct.

**DATED:** August 3, 2025 (Australian Eastern Standard Time)

Respectfully submitted.



**H. Gavin Solomon**

37 Kells Creek Road

Woodlands, NSW 2575

Australia

Email: gs@larpagroup.com

Phone: +61 412 978 777



**Gavin Solomon**

**From:** Gavin Solomon  
**Sent:** Monday, 4 August 2025 9:47 AM  
**To:** 'tyler\_laws@txs.uscourts.gov'; 'sdtx\_bankruptcy\_prose@txs.uscourts.gov';  
 'LinqtoInfo@epiqglobal.com'; 'ghamm@nvfirm.com'; 'ha.nguyen@usdoj.gov';  
 'piu@doj.ca.gov'; 'maza@sec.gov'; 'michael.stewart@faegredrinker.com'; Dalia  
 Blass; 'spalley@brownrudnick.com'; John D'Ercole  
**Subject:** Linqto Texas - Pro Se Filing - Notice of Preservation of Rights and Conditional  
 Objection to Classification of Unitholders as Creditors  
**Attachments:** Linqto -Notice of Preservation of Rights and Conditional Objection to Classification  
 of Unitholders as Creditors (signed by GS).pdf

IN RE LINQTO TEXAS, LLC, et al.,

Debtors.

CASE Nos. 25-90186 THROUGH 25-90189 (Jointly Administered)

Hon. Alfredo R. Perez, United States Bankruptcy Judge

To each of below named parties, please find attached my pro se filing titled "Notice of Preservation of Rights and  
 Conditional Objection Classification of Unitholders as Creditors" submitted in good faith under 11 U.S.C. § 1109(b).

I respectfully request that this document be entered into the record.

Please contact me if you require any further information or documentation.

PARTY	NAME	EMAIL
United States Bankruptcy Judge Alfredo R Perez	Case Manager	tyler_laws@txs.uscourts.gov
United States Bankruptcy Court for the Southern District of Texas	Pro Se Filing Email (for non-attorneys)	sdtx_bankruptcy_prose@txs.uscourts.gov
EPIQ Case Management	Claims and Case Administrator	LinqtoInfo@epiqglobal.com
Debtors' Counsel	Schwartz PLLC	ghamm@nvfirm.com
United States Trustee	US Trustee, Region 7	ha.nguyen@usdoj.gov
California Attorney General	Consumer Protection Section - Bankruptcy Notices	piu@doj.ca.gov
Securities and Exchange Commission	Alan Maza, Senior Bankruptcy Counsel	maza@sec.gov
Counsel for Lender	Faegre Drinker Biddle & Reath LLP	michael.stewart@faegredrinker.com
Additional Debtors' Counsel	Sullivan & Cromwell LLP	blasse@sulcrom.com
Counsel for Official Committee of Unsecured Creditors	Brown Rudnick LLP	spalley@brownrudnick.com
Counsel for Sapient Group USA, LLC	Leech Tishman Robinson Brog PLLC	jdercole@leechtishman.com

Thanking you in anticipation. Kindest Regards

Gavin Solomon

E: gs@lapgroup.com

M: +61 (0) 412 978 777

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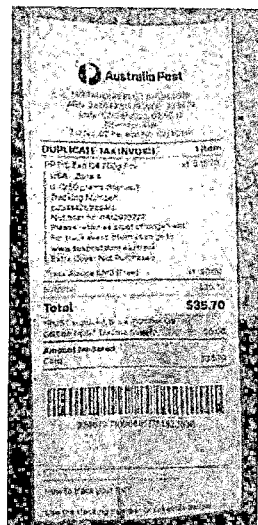
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 \*POST applied, price includes GST  
 GST on POST Taxable Supply: \$0.00  
 Amount tendered  
 Card \$21.55



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 TOTAL EFTPOS 21.55  
 AUTH 132155  
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**Gavin Solomon**

---

**From:** Tyler Laws <Tyler\_Laws@txs.uscourts.gov>  
**Sent:** Tuesday, 5 August 2025 7:07 AM  
**To:** Gavin Solomon  
**Subject:** RE: Linqto Texas - Pro Se Filing - Notice of Preservation of Rights and Conditional Objection to Classification of Unitholders as Creditors

Good afternoon,

That's directed directly to the Clerk's Office. It should be fine, but you can follow up with them at 713-250-5500 if you do not see it on the docket in the case in the next few days.

Thanks,

**Tyler Laws, Case Manager**  
The Honorable Alfredo R Pérez  
United States Bankruptcy Court for the Southern District of Texas  
515 Rusk Street, 4th Floor  
Houston, Texas 77002  
(713) 250-5421

---

**From:** Gavin Solomon <gs@larpagroup.com>  
**Sent:** Monday, August 4, 2025 3:58 PM  
**To:** Tyler Laws <Tyler\_Laws@txs.uscourts.gov>  
**Cc:** sdtx\_bankruptcy\_prose@txs.uscourts.gov; LinqtoInfo@epiqglobal.com; ghammm@nvfirm.com; ha.nguyen@usdoj.gov; piu@doj.ca.gov; mazaa\_sec.gov <mazaa@sec.gov>; michael.stewart@faegredrinker.com; Dalia Blass <Blassd@sullcrom.com>; spalley@brownrudnick.com; John D'Ercole <jdercole@leechtishman.com>  
**Subject:** Re: Linqto Texas - Pro Se Filing - Notice of Preservation of Rights and Conditional Objection to Classification of Unitholders as Creditors

**CAUTION - EXTERNAL:**

Tyler, many thanks for your email just now.

Sorry to trouble you but I did yesterday post the original Notice by international post registered from Australia to US Bankruptcy Court Suite 5300 515 Rusk Street Houston Texas (see page 10 of my document I emailed you yesterday) - is that sufficient or do I need to post a fresh Notice to the PO Box as you just advised.

Your clarification would be greatly appreciated. Regards

Gavin Solomon  
Sent from my iPad  
[gs@larpagroup.com](mailto:gs@larpagroup.com)  
+ 61 (0)412 978777

On 5 Aug 2025, at 12:07 am, Tyler Laws <Tyler\_Laws@txs.uscourts.gov> wrote:



Good morning,

The Court does not accept filings/documents by email. To file something on the docket, you may physically bring it to the Clerk's Office at the location address below or mail it in to the correspondence address below:

**Location:**

Bob Casey United States Courthouse  
515 Rusk Avenue  
Houston, TX 77002

**Correspondence:**

Nathan Ochsner  
Clerk of Court  
P. O. Box 61010  
Houston, TX 77208

Thanks,

**Tyler Laws, Case Manager**

The Honorable Alfredo R Pérez  
United States Bankruptcy Court for the Southern District of Texas  
515 Rusk Street, 4th Floor  
Houston, Texas 77002  
(713) 250-5421

**From:** Gavin Solomon <[gs@larpagroup.com](mailto:gs@larpagroup.com)>

**Sent:** Sunday, August 3, 2025 6:48 PM

**To:** Tyler Laws <[Tyler\\_Laws@txs.uscourts.gov](mailto:Tyler_Laws@txs.uscourts.gov)>; [sdtx\\_bankruptcy\\_prose@txs.uscourts.gov](mailto:sdtx_bankruptcy_prose@txs.uscourts.gov);  
[LinqtoInfo@epiglobal.com](mailto:LinqtoInfo@epiglobal.com); [ghammm@nvfirm.com](mailto:ghammm@nvfirm.com); [ha.nguyen@usdoj.gov](mailto:ha.nguyen@usdoj.gov); [piu@doj.ca.gov](mailto:piu@doj.ca.gov);  
[mazaa\\_sec.gov](mailto:mazaa_sec.gov) <[mazaa@sec.gov](mailto:mazaa@sec.gov)>; [michael.stewart@faegredrinker.com](mailto:michael.stewart@faegredrinker.com); Dalia Blass  
<[Blassd@sullcrom.com](mailto:Blassd@sullcrom.com)>; [spalley@brownrudnick.com](mailto:spalley@brownrudnick.com); John D'Ercole <[jdercole@leechtishman.com](mailto:jdercole@leechtishman.com)>

**Subject:** Linqto Texas - Pro Se Filing - Notice of Preservation of Rights and Conditional Objection to Classification of Unitholders as Creditors

**CAUTION - EXTERNAL:**

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To each of below named parties, please find **attached** my pro se filing titled "**Notice of Preservation of Rights and Conditional Objection Classification of Unitholders as Creditors**" submitted in good faith under 11 U.S.C. § 1109(b).

I respectfully request that this document be entered into the record.

Please contact me if you require any further information or documentation.

PARTY	NAME	EMAIL


United States Bankruptcy Judge Alfredo R Perez	Case Manager	tyler_laws@txs.uscourts.gov
United States Bankruptcy Court for the Southern District of Texas	Pro Se Filing Email (for non-attorneys)	sdtx_bankruptcy_prose@txs.uscourts.gov
EPIQ Case Management	Claims and Case Administrator	LinqtoInfo@epiqglobal.com
Debtors' Counsel	Schwartz PLLC	ghammm@nvfirm.com
United States Trustee	US Trustee, Region 7	ha.nguyen@usdoj.gov
California Attorney General	Consumer Protection Section – Bankruptcy Notices	piu@doj.ca.gov
Securities and Exchange Commission	Alan Maza, Senior Bankruptcy Counsel	mazaa@sec.gov
Counsel for Lender	Faegre Drinker Biddle & Reath LLP	michael.stewart@faegredrinker.com
Additional Debtors' Counsel	Sullivan & Cromwell LLP	blasse@sullcrom.com
Counsel for Official Committee of Unsecured Creditors	Brown Rudnick LLP	spalley@brownrudnick.com
Counsel for Sapien Group USA, LLC	Leech Tishman Robinson Brog PLLC	jdercole@leechtishman.com

Thanking you in anticipation. Kindest Regards

**Gavin Solomon**

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