NACH, RODGERS, HILKERT & SANTILLI
1220 E. Osborn Rd., Suite 101
Phoenix, AZ 85014
Telephone No.: (602) 258-6000
Facsimile No.: (602) 258-6003
Stuart B. Rodgers – 025720
Paul M. Hilkert - 028934
Email: stuart.rodgers@nrhslaw.com
paul.hilkert@nrhslaw.com
docket@nrhslaw.com

Attorneys for Robert A. MacKenzie, Trustee

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF ARIZONA

In re: CYBER-DIVE CORP., Debtor.	(Chapter 7 Case) No. 2:26-bk-08459-DPC **NOTICE OF HEARING ON TRUSTEE'S MOTION TO SELL ASSETS OF THE ESTATE FREE AND CLEAR OF LIENS, CLAIMS, INTERESTS, AND ENCUMBRANCES SUBJECT TO HIGHER AND BETTER OFFERS** **AND** **NOTICE TO CREDITORS AND INTERESTED PARTIES OF SALE OF PROPERTY** **Date:** **November 19, 2026** **Time:** **11:00 a.m. (AZ time)** **Location:** **U.S. Bankruptcy Court** **Courtroom 603** **230 N 1st Ave, Ste 101** **Phoenix, AZ 85003** **(or via Zoom as indicated below)**

TO: ALL CREDITORS AND PARTIES IN INTEREST

NOTICE IS HEREBY GIVEN that on October 9, 2026, Robert A. MacKenzie, Chapter 7 Trustee (the "**Trustee**"), filed a *Motion to Sell Assets of the Estate Free and Clear of Liens, Claims, Interests, and Encumbrances Subject to Higher and Better Offers* (the "Motion"), a complete copy of which is on file with the Clerk of the Court and available for inspection or which may be provided upon written request to the Trustee's counsel as indicated hereinabove. The Motion requests authorization to sell substantially all of the Debtor's assets at the below Hearing, subject to higher and better offers to be considered at the Hearing. The pertinent provisions of the Motion are set forth hereinafter.

HEARING AND DEADLINE TO OBJECT

The Court has scheduled a hearing for **November 19, 2026** at **11:00 a.m**. Phoenix, Arizona time (the "**Hearing**"). The Hearing is to be held before the Honorable Daniel P. Collins.

Counsel located in Maricopa County, Arizona are required to appear in person at the U.S. Bankruptcy Court, 230 North First Avenue, Courtroom 603, Phoenix, AZ, 85003.

Counsel located outside of Maricopa County, Arizona and non-attorney participants may, at their option, appear by Zoom using the following link:

https://www.zoomgov.com/j/1605289889?pwd=eGdIYjhhY2ViaXFvMHJXeDZoUTVQQT09

Meeting ID: 160 528 9889
Passcode: 479849

NOTICE IS FURTHER GIVEN that any person opposing the Motion shall file a written objection, specifying the reason therefor, on or before twenty-one (21) days from the date of the mailing of this Notice as follows: United States Bankruptcy Court, as follows: (a) by hand-delivery or mail to the Clerk of the Court, 230 North First Avenue, Suite 101, Phoenix, Arizona 85003-1706; or (b) electronically at the Court's website: ecf.azb.uscourts.gov using the Court's electronic filing procedures, with a copy to: Nach, Rodgers, Hilkert & Santilli at the address set forth hereinbefore. **Failure to appear at the Hearing or to timely object to the Motion may result in the requested relief being granted by the Court without further notice to you.**

NOTICE OF MOTION

NOTICE IS FURTHER GIVEN that the Estate's interest in the hereinafter-described Property will be offered to the person making the highest and best bid at the hearing on **November 19, 2026 at 11:00 a.m.**

Property to be Sold:	The Estate's interest in substantially all assets of the Debtor, including (collectively, the "**Property**"): • all issued patents and pending patent applications; • all provisional applications, continuations, continuations-in-part, divisionals, reissues, foreign equivalents, priority rights and rights to pursue further applications; • all related invention disclosures, patent prosecution materials and intellectual-property records; • all operating-system source code, object code, firmware, software, applications, APIs, libraries, repositories, version histories, build environments, deployment scripts and related know-how; • all AI and machine-learning technology, including models, model architectures, algorithms and model weights owned by the estate; • all legally transferable non-personal training, validation and testing datasets, annotation data, and associated documentation;

	• all copyrights and other intellectual-property rights; • all trademarks, product names, trading names, logos and associated goodwill, including "Cyber-Dive", "Aqua One", "Aqua X", and "UniteOS"; • all domain names, websites and transferable digital assets; • all hardware designs, specifications, prototypes, engineering documentation and manufacturing materials; • all computers, laptops, development machines, servers, storage and networking equipment; • all development, testing and diagnostic equipment; • all mobile phones, smartphones, tablets, development devices, demonstration devices and test devices; and • all stock and inventory, including finished devices, spare devices, components, accessories and packaging. The Property excludes the following: • The Debtor's existing customer base; • customer contracts unless expressly selected by the Purchaser; • customer lists or databases; • customer, parent, guardian or child personal information; • customer images, communications, location data, account information or historical monitoring data; • training data containing customer or other personal information; and • any other personal or regulated data unless expressly agreed following satisfactory legal and privacy review.
Terms of Sale:	**Interested buyers must do their own due diligence to determine the extent of the Estates' interest in the Property**. The Property will be sold **As-Is**, **Where-Is**, **with No Representations, Guarantees or Warranties**, free and clear of liens, claims, encumbrances and interests to the extent authorized under 11 U.S.C. § 363(f), with valid enforceable interests attaching to net proceeds. This is an asset-only sale with no assumed liabilities of the Debtor except those expressly accepted. The Estate's interest in the Property will be conveyed to the prevailing purchaser by bill of sale or general assignment to be prepared by the Trustee. The purchaser will be responsible for preparing any additional transfer documents, subject to Trustee review and approval prior to execution. The Offer is conditioned upon purchaser due diligence as described in the Motion.
Proposed Purchaser:	The Trustee received an opening cash offer of $100,000 (the "**Offer**"). The purchaser's identity ("**Buyer**") will be disclosed

	before sale approval.
Bidding/Over Bids:	The sale is subject to higher and better offers and Court-approved procedures. The Motion requests overbid increments of $2,500 to $5,000, subject to Court approval. No break-up fee or expense reimbursement is proposed.
Insider:	Buyer is not an insider and is a good faith purchaser and is entitled to the benefits provided by 11 U.S.C. § 363(m).
To View the Property or Obtain More Information:	The Trustee is coordinating a virtual presentation that will be conducted by one or more of the Debtor's former employees. The details of the virtual presentation will be provided in a supplemental pleading. Interested participants may be required to sign an NDA in order to participate in the virtual presentation. Additional questions regarding the Property or requests to obtain information for the virtual presentation may be obtained by contacting Trustee's counsel at the above email address or telephone number.
Description of Interest(s) in the Property:	The Trustee proposes to sell the Estate's interest in the Property. The Trustee is not aware of any UCC filings involving the Debtor. A copy of the UCC search reports are attached as an Exhibit to the Motion. **The Buyer and any other interested bidders must do their own due diligence to determine liens or other claims against the Property**.
Appraisals:	The Trustee is not aware of any recent appraisals for the Property being sold.
Compensation/Fees:	There are no commissions or fees associated with the sale of the Property.
Waiver of 14-Day Stay:	The Trustee requests waiver or reduction of the stay under Bankruptcy Rule 6004(h).
Motion for Stay Relief:	No stay relief motion has been filed as to the Property.

DATED: October 14, 2026

NACH, RODGERS, HILKERT & SANTILLI

By: /s/ Paul M. Hilkert
Stuart B. Rodgers
Paul M. Hilkert
Attorney for Trustee