

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

In re:	§	
	§	
AMPLE, INC.,	§	Case No. 25-90817 (CML)
Debtor.	§	Chapter 11
	§	

In re:	§	
	§	
AMPLE TEXAS EV, LLC,	§	Case No. 25-90816 (CML)
Debtor.	§	Chapter 11
	§	

**EMERGENCY MOTION OF DEBTORS FOR ENTRY OF AN ORDER
(I) AUTHORIZING JOINT ADMINISTRATION OF THE CHAPTER 11 CASES
AND (II) GRANTING RELATED RELIEF**

Emergency relief has been requested. Relief is requested not later than 2:00 p.m. (prevailing Central Time) on December 18, 2025.

If you object to the relief requested or you believe that emergency consideration is not warranted, you must appear at the hearing, if one is set, or file a written response prior to the date that relief is requested in the preceding paragraph. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

A hearing will be conducted on this matter on December 18, 2025 at 2:00 p.m. (prevailing Central Time) in Courtroom 402, 4th floor, 515 Rusk Street, Houston, Texas 77002.

Participation at the hearing will only be permitted by an audio and video connection.

Audio communication will be by use of the Court's dial-in facility. You may access the facility at (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Lopez's conference room number is 590153. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Lopez's home page. The meeting code is "JudgeLopez". Click the settings icon in the upper right corner and enter your name under the personal information setting.

Hearing appearances must be made electronically in advance of both electronic and in-person hearings. To make your appearance, click the "Electronic Appearance" link on Judge Lopez's home page. Select the case name, complete the required fields and click "Submit" to complete your appearance.

The above-captioned debtors in possession (collectively, the "Debtors") respectfully state the following in support of this emergency motion (this "Motion"):



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RELIEF REQUESTED

1. By this Motion, the Debtors request entry of an order, substantially in the form attached hereto (the “Proposed Order”), directing the joint administration of their above-captioned chapter 11 cases for procedural purposes only and granting related relief. The Debtors request that one file and one docket be maintained for all of the jointly administered cases under the case Ample Inc., *et al.*, Case No. 25-90816 (CML) and that the cases be administered under a consolidated caption, as follows:

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

In re:	§	
	§	
AMPLE, INC., <i>et al.</i> ,	§	Case No. 25-90817 (CML)
Debtor.	§	Chapter 11
	§	(Jointly Administered)
	§	

¹ A complete list of each of the Debtors in these chapter 11 cases (the “Chapter 11 Cases”) and the last four digits of each Debtor’s taxpayer identification number are: Ample Inc. (4015) and Ample Texas EV, LLC (6832). A copy of this Motion is available on (a) the Court’s website, at www.txs.uscourts.gov and (b) the website maintained by the Debtors’ proposed claims and noticing agent, Verita Global at <https://veritaglobal.net/ample>.

2. The Debtors further request that this Court order that the foregoing caption satisfies the requirements set forth in section 342(c)(1) of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”).

3. The Debtors also request that a docket entry, substantially similar to the following, be entered on the Ample Texas EV, LLC’s docket to reflect the joint administration of the Chapter 11 Cases:

An order has been entered in this case consolidating this case with the case of Ample Inc., Case No. 25-90817 (CML) for procedural purposes only and providing for its joint administration in accordance with the terms thereof. The docket in Case No. 25-90817 (CML) should be consulted for all matters affecting this case.

JURISDICTION AND VENUE

4. The United States Bankruptcy Court for the Southern District of Texas (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b), and the Court may enter a final order consistent with Article III of the United States Constitution. Venue is proper under 28 U.S.C. §§ 1408 and 1409.

5. The statutory and legal predicates for the relief requested herein are sections 105(a) and 342(c) of the Bankruptcy Code, rules 1005, 1015 and 2002 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 1015-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the Procedures for Complex Cases in the Southern District of Texas.

BACKGROUND

6. On the date hereof (the “Petition Date”), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors continue to operate their businesses and manage their properties as debtors in possession under sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner, or statutory committee has been appointed in the Chapter 11 Cases.

7. Founded in 2014, Ample’s mission is to address fleet electrification challenges by developing modular battery-swapping solutions that make EV energy replenishment fast, convenient, and scalable. The Company has developed proprietary autonomous swapping stations, modular battery systems, and integrated vehicle hardware and software that allow depleted EV batteries to be exchanged for fully charged ones in minutes, without requiring significant vehicle re-engineering and with materially less downtime than conventional charging. Ample’s modular

stations can be deployed quickly, require a compact footprint, and are designed to support a wide range of OEM vehicle platforms, making them well suited for urban and suburban environments.

8. Additional factual background regarding the Debtors, including their business, their capital structure, and the events leading to the commencement of the Chapter 11 Cases is set forth in the *Declaration of John D. Baumgartner, Chief Restructuring Officer of the Debtors, in Support of the Chapter 11 Petitions and First-Day Relief* (the “First Day Declaration”), filed contemporaneously herewith and incorporated herein by reference.¹

BASIS FOR RELIEF

9. Bankruptcy Rule 1015(b) provides that “if . . . two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order joint administration of the estates.” See Fed. R. Bankr. P. 1015(b). The Debtors are “affiliates” as such term is defined in section 101(2) of the Bankruptcy Code. Bankruptcy Local Rule 1015-1 provides additional authority for the Court to order joint administration of the chapter 11 cases. *See* BLR 1015-1.

10. Joint administration will ease the administrative burden on the Court and all parties in interest by, among other things, eliminating the need for duplicative pleadings, notices, and orders in each of the respective dockets and saving the Court, the Debtors, and other parties in interest substantial time and expense when preparing and filing such documents. Further, joint administration will protect parties in interest by ensuring that they will be apprised of the various motions filed with the Court with respect to each of the Debtors’ cases.

11. The rights of the respective creditors of each of the Debtors will not be adversely affected by joint administration of these cases because the relief sought is purely procedural and is in no way intended to affect substantive rights. Each creditor and party in interest will maintain

¹ Capitalized terms used but not defined herein have the meanings given to them in the First Day Declaration.

whatever rights it has against the particular estate in which it allegedly has a claim or right. In addition, all creditors will benefit from the reduction in costs that will result from joint administration.

12. The use of the simplified, consolidated caption proposed herein, without reference to their respective tax identification numbers and other detail specified by section 342(c) of the Bankruptcy Code and Bankruptcy Rule 2002(n), will eliminate cumbersome and confusing procedures and ensure a uniformity of pleading identification. Further, such case-specific information will be listed in the petitions for each Debtor, which are publicly available to parties in interest or will be provided by the Debtors upon request; and this information will be included in key notices to parties in interest, such as the notices required under Bankruptcy Rules 2002(a)(1), 2002(a)(7), and 2002(b), as made applicable to the chapter 11 cases. Therefore, the Debtors submit that the policies behind the requirements of Bankruptcy Code section 342(c) and Bankruptcy Rules 1005, 1015, and 2002(n) have been satisfied.

EMERGENCY CONSIDERATION

13. The Debtors respectfully request emergency consideration of this Motion pursuant to Bankruptcy Local Rule 9013-1 and Bankruptcy Rule 6003, which authorizes the Court to grant relief within the first 21 days after the commencement of a chapter 11 case to the extent that relief is necessary to avoid immediate and irreparable harm. As described in detail above and in the First Day Declaration, immediate and irreparable harm would result if the relief requested herein is not granted. Accordingly, the Debtors submit that the requirements of Bankruptcy Rule 6003 are satisfied.

[remainder of page intentionally left blank]

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, granting the relief requested in the Motion and such other and further relief as may be just and proper.

Date: December 16, 2025

PILLSBURY WINTHROP SHAW PITTMAN LLP

By: /s/ Hugh M. Ray, III

Hugh M. Ray, III
TX Bar No. 24004246
Joshua Stenhjem (*pro hac vice* pending)
ND Bar No. 09941
609 Main Street, Suite 2000
Houston, TX 77002
Telephone: 713-276-7600
Facsimile: 713-276-7634
hugh.ray@pillsburylaw.com
joshua.stenhjem@pillsburylaw.com

--and--

Andrew V. Alfano
NY Bar No. 5525241
31 West 52nd Street
New York, NY 10019-6131
Telephone: 212-858-1000
Facsimile: 212-858-1500
andrew.alfano@pillsburylaw.com

***Proposed Counsel for Debtors, Ample, Inc. and
Ample Texas EV, LLC***

CERTIFICATE OF SERVICE

I certify that on December 16, 2025, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Hugh M. Ray, III

Hugh M. Ray, III

**IN THE UNITED STATES BANKRUPTCY COURT
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Debtor.	§	Chapter 11
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AMPLE TEXAS EV, LLC,	§	Case No. 25-90816 (CML)
Debtor.	§	Chapter 11
	§	

**ORDER (I) AUTHORIZING JOINT ADMINISTRATION OF THE
CHAPTER 11 CASES AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)¹ of the Debtors for entry of an order (this “Order”) (i) directing the joint administration of the chapter 11 cases for procedural purposes only; and (ii) granting related relief, all as more fully set forth in the Motion; and the Court having reviewed the Motion and the First Day Declaration; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. § 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and upon the record herein; and after due deliberation thereon; and all objections, if any, to the Motion having been withdrawn, resolved, or overruled; and the Court having determined that the legal and factual bases set forth in the Motion establish

¹ Capitalized terms used but not defined herein have the meanings given to them in the Motion.

just cause for the relief granted herein; and the Court having determined that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest, it is hereby

ORDERED, ADJUDGED AND DECREED THAT:

1. The above-captioned cases are consolidated for procedural purposes only and shall be jointly administered by this Court under Case No. 25-90817 (CML). All of the jointly administered cases are assigned to Judge Christopher M. Lopez.

2. Additionally, the following checked items are ordered:

- a. ☒ One disclosure statement and plan of reorganization may be filed for all of the cases by any plan proponent.
- b. ☒ Parties may request joint hearings on matters pending in any of the jointly administered cases.
- c. ☒ Other: See below.

3. The caption of the jointly administered cases should read as follows:

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

In re:	§	
	§	
AMPLE, INC.,	§	Case No. 25-90817 (CML)
Debtor.	§	Chapter 11
	§	(Jointly Administered)
	§	

¹ The Debtors in these chapter 11 cases (the “Chapter 11 Cases”) and the last four digits of each Debtor’s taxpayer identification number are: Ample Inc. (4015) and Ample Texas EV, LLC (6832). A copy of this Motion is available on (a) the Court’s website, at www.txs.uscourts.gov and (b) the website maintained by the Debtors’ claims and noticing agent, Verita Global at <https://veritaglobal.net/ample>.

4. The foregoing caption satisfies the requirements set forth in section 342(c)(1) of the Bankruptcy Code.

5. All pleadings and other documents to be filed in the jointly administered cases shall be filed and docketed in the case of Ample Inc., et al., Case No. 25-90817 (CML).

6. The following docket entry shall be made in the Chapter 11 Cases of the Debtors, other than Ample Inc.:

An order has been entered in this case consolidating this case with the case of Ample Inc., et al., Case No. 25-90817 (CML) for procedural purposes only and providing for its joint administration in accordance with the terms thereof. The docket in Case No. 25-90817 (CML) should be consulted for all matters affecting this case.

7. The Debtors shall maintain, and the Clerk of this Court shall keep, one consolidated docket, one file, and one consolidated service list for the chapter 11 cases.

8. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of the chapter 11 cases, and this Order shall be without prejudice to the rights of the Debtors to seek entry of an order substantively consolidating their respective cases.

9. Notice of the Motion as provided therein shall be deemed good and sufficient notice thereof, and the requirements of the Bankruptcy Rules and Bankruptcy Local Rules are satisfied by such notice.

10. Notwithstanding Bankruptcy Rule 6004(h), to the extent applicable, this Order shall be effective and enforceable immediately upon entry hereof.

11. The Debtors are authorized and empowered to take all actions necessary or appropriate to implement the relief granted in this Order.

12. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SIGNED: _____, 2025

UNITED STATES BANKRUPTCY JUDGE