

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

In re:	§	
	§	
AMPLE, INC., <i>et al.</i> , <sup>1</sup>	§	Case No. 25-90817 (CML)
	§	Chapter 11
Debtors.	§	(Joint Administration Requested)
	§	

**EMERGENCY MOTION OF DEBTORS FOR ENTRY OF AN ORDER  
(A) EXTENDING THE TIME TO FILE SCHEDULES AND STATEMENTS  
AND 2015.3 REPORTS; AND (B) 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.

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<sup>1</sup> 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.tx.uscourts.gov](http://www.tx.uscourts.gov) and (b) the website maintained by the Debtors' claims and noticing agent, Verita Global at <https://veritaglobal.net/ample>.



Ample, Inc. and its debtor affiliate in the above-captioned cases, as debtors and debtors in possession (together, the “Debtors”) respectfully state as follows in support of this motion (this “Motion”):

### **RELIEF REQUESTED**

1. By this Motion, the Debtors seek entry of an order, substantially in the form attached hereto (the “Proposed Order”): (a) extending the deadline by which the Debtors must file schedules of assets and liabilities and statements of financial affairs (collectively, the “Schedules and Statements”) and initial reports of financial information in respect of entities in which their estates hold a controlling interest as set forth in Bankruptcy Rule 2015.3 (collectively, the “2015.3 Reports”), in each case, through and including January 29, 2026, without prejudice to the Debtors’ ability to request additional extensions for cause shown, and (b) granting related relief.

### **JURISDICTION AND VENUE**

2. The United States Bankruptcy Court for the Southern District of Texas (the “Court”) has jurisdiction to consider this Motion under 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b) and this 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.

3. The statutory and legal predicates for the relief requested herein are sections 105(a) and 521 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), rules 1007, 2015.3, and 9006(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), rule 9013-1 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**

4. On December 16, 2025 (the “Petition Date”), the Debtors filed voluntary petitions 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.

5. Contemporaneously with the filing of this Motion, the Debtors filed a motion requesting joint administration of the Chapter 11 Cases, for procedural purposes, pursuant to Bankruptcy Rule 1015(b) and Bankruptcy Local Rule 1015-1.

6. 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.

7. 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.<sup>2</sup>

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<sup>2</sup> Capitalized terms used but not defined herein have the meanings given to them in the First Day Declaration.

**BASIS FOR RELIEF**

8. The requirements of section 521 of the Bankruptcy Code and Bankruptcy Rule 1007(c) ordinarily require a debtor to file its Schedules and Statements within fourteen days of the Petition Date. 11 U.S.C. § 521; Bankruptcy Rule 1007(c). Pursuant to Bankruptcy Rules 1007(a)(5), 1007(c), and 9006(b), however, the Court has authority to extend the time required for filing the Schedules and Statements “for cause.” Fed. R. Bankr. P. 1007 and 9006(b).

9. Further, pursuant to Bankruptcy Rule 2015.3, a chapter 11 debtor must file, no later than seven days before the date set for the meeting of creditors pursuant to section 341 of the Bankruptcy Code and no less than every six months thereafter, periodic financial reports of the value, operations, and profitability of each entity that is not a publicly traded corporation or a debtor in the Chapter 11 Cases, and in which the estate holds a substantial or controlling interest. Fed. R. Bankr. P. 2015.3(a)–(c). Bankruptcy Rule 9006(b)(1) provides the Court with authority to extend the period of time to file the 2015.3 Reports “for cause.” Fed. R. Bankr. P. 9006(b)(1). Additionally, Bankruptcy Rule 2015.3(d) provides the Court with the ability, after notice and a hearing, to modify the reporting requirements for cause, including that the debtor is “not able, after a good faith effort, to comply with those reporting requirements, or that the information ... is publicly available.” Fed. R. Bankr. P. 2015.3(d).

10. Lastly, Bankruptcy Local Rule 2015-3 requires debtors to file the 2015.3 Reports monthly. See Bankr. Local R. 2015-3. The Court, however, “may modify the application of the [Bankruptcy Local Rules] in any case.” Bankr. Local R. 1001-1.

11. The Debtors submit good and sufficient cause exists here to grant an extension of the time to file the Schedules and Statements and 2015.3 Reports. Specifically, the Debtors will have to compile detailed information from books and records relating to the Debtors’ secured and

unsecured obligations, leases, tax liabilities, employee-related claims, and executory contracts across multiple domestic and foreign entities. Although the volume of information is not unusually large for a mid-sized technology and manufacturing enterprise, it is dispersed across different systems, business units, and geographic locations, including Ample's U.S. operations and its foreign affiliates. Collecting, reviewing, and validating this information will require a significant expenditure of time by the Debtors, their remaining employees, and their professionals at a critical early stage when attention is necessarily focused on stabilizing operations and preserving value for stakeholders.

12. Before the Petition Date, the Debtors focused on preparing for the chapter 11 filings, preparing the business to transition into chapter 11, and negotiating with certain stakeholders and other parties in interest. Although the Debtors have commenced the process that will enable them to prepare and finalize the Schedules and Statements and 2015.3 Reports, and are working diligently to move the process forward, the Debtors anticipate that they may require up to 30 additional days to complete the Schedules and Statements and file 2015.3 Reports for a total of 44 days after the Petition Date.

13. The Debtors submit that the breadth of information required, the need to reconcile records across multiple operating subsidiaries and discontinued business lines, and the reliance on a small remaining employee base to assist outside advisors required to complete the Schedules and Statements and 2015.3 Reports constitute good and sufficient cause for granting the requested extension of time. Moreover, an extension will not harm creditors or other parties in interest because, even under the extended deadline, the Debtors will file the Schedules and Statements in advance of any deadline for filing proofs of claim in the Chapter 11 Cases.

14. Accordingly, the Debtors respectfully request that the Court (a) extend the time for filing the Schedules and Statements and 2015.3 Reports, in each case, through and including January 29, 2026, without prejudice to the Debtors' right to request further extensions, for cause shown and (b) grant such other relief as may be just and proper.

**EMERGENCY CONSIDERATION**

15. The Debtors respectfully request emergency consideration of this Motion pursuant to Bankruptcy Local Rule 9013-1. As described in detail above and in the First Day Declaration, maintaining the current deadlines would hinder the Debtors' ability to comply with their initial reporting obligations and divert resources from stabilizing operations, and therefore the Debtors respectfully submit that emergency consideration is warranted. Moreover, the Motion requests relief from procedural rules and requirements that pertain to matters of immediate significance. Accordingly, the Debtors submit that emergency consideration is necessary and respectfully request that this Motion be heard on an emergency basis.

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

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***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  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	§	
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AMPLE, INC., <i>et al.</i> , <sup>1</sup>	§	Case No. 25-90817 (CML)
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**ORDER (A) EXTENDING THE TIME TO FILE SCHEDULES AND STATEMENTS  
AND 2015.3 REPORTS; AND (B) GRANTING RELATED RELIEF**

Upon the emergency motion (the “Motion”)<sup>2</sup> of the Debtors for entry of an order (this “Order”) (a) extending the time period to file their Schedules and Statements and 2015.3 Reports; (b) modifying the requirements of Bankruptcy Local Rule 2015-3; and (c) 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 just cause for

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<sup>2</sup> Capitalized terms used but not defined herein have the meanings given to them in the Motion.



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 time within which the Debtors must file the Schedules and Statements and 2015.3 Reports is extended, in each case, through and including January 29, 2026, without prejudice to the Debtors' right to seek additional extensions from the Court or, alternatively, to obtain further extensions without need for Court order upon entering into a stipulation with the U.S. Trustee and filing such stipulation on the Court's docket.

2. Notice of the Motion is adequate under the Bankruptcy Rules, including Bankruptcy Rule 6004(a), and the Bankruptcy Local Rules.

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

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

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

SIGNED: \_\_\_\_\_, 2025

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CHRISTOPHER M. LOPEZ  
UNITED STATES BANKRUPTCY JUDGE