

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

AMPLE, INC., *et al.*,¹

Debtor.

Case No. 25-90817 (CML)

Chapter 11
(Jointly Administered)

Honorable Christopher M. Lopez

**STIPULATION AND AGREED ORDER REGARDING PRE-PETITION
ABANDONMENT OF PROPERTY AND AUTHORIZATION,
INCLUDING RELIEF FROM STAY, TO ACT AS DEBTOR'S
ATTORNEY-IN-FACT TO DESTROY AND/OR DISPOSE OF ABANDONED PROPERTY**

TO THE HONORABLE CHRISTOPHER M. LOPEZ, UNITED STATES BANKRUPTCY JUDGE:

Debtor AMPLE, INC. ("Debtor") and Creditor TQL GLOBAL, LLC ("TQL Global") (collectively, the "Parties"), by and through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, on December 16, 2025, Debtor filed a voluntary Chapter 11 petition in this Court commencing the above-referenced proceeding.

WHEREAS, pre-petition, Debtor and TQL Global regularly conducted business together on a continuing basis, including, without limitation, TQL Global providing ocean transportation intermediary and customs brokerage services to Debtor, and in connection therewith, Debtor executed a Combined Export/Import Power of Attorney; Designation As Forwarding Agent; and Acknowledgement of Terms and Conditions of Service ("POA") which appointed TQL Global to act for and on Debtor's behalf as a true and lawful agent and attorney-in-fact of Debtor in the United States whether as customs broker, forwarding agent or for any other related activity and authorized TQL Global to, among other things, transact customs business

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 Order 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>.



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on behalf of Debtor and to make, endorse, sign, declare and swear to customs entries and other documents relating thereto for and in the name of Debtor.

WHEREAS, pre-petition, Debtor and TQL Global entered into a business transaction, pursuant to which TQL Global arranged for transportation of certain Merchandise² from overseas into the United States on behalf of Debtor.

WHEREAS, Debtor failed to remit certain required customs duties and taxes and otherwise take required action with respect to the Merchandise to United States Customs and Border Protection (“CBP”) and as a result, the Merchandise did not clear U.S. customs.

WHEREAS, as a result of the failure of the Merchandise to clear U.S. customs, the Merchandise has been held at port and substantial demurrage charges have accrued and continue to accrue with respect to the Merchandise.

WHEREAS, due to the de minimis value of the Merchandise as compared to the customs duties and taxes (as well as considering other factors including other costs and expenses), it was determined to be more economically prudent to destroy and/or dispose of the Merchandise (which requires consent of and oversight by CBP).

WHEREAS, considering various factors including the de minimis value of the Merchandise and amount of customs duties and taxes and other charges owed with respect to the Merchandise, on November 12, 2025, pre-petition, Debtor voluntarily abandoned all ownership and claims to the Merchandise in writing (“Abandonment Letter”). A true and correct copy of the Abandonment Letter is attached hereto as **Exhibit A**.

WHEREAS, Debtor acknowledged in the Abandonment Letter, among other things, that it waived all rights to the Merchandise, and agreed that the Merchandise may be disposed of.

WHEREAS, the Parties wish to prevent any further incurrence of demurrage charges.

WHEREAS, the Parties have determined in their business judgments that it is in the best interests of the Parties to destroy and/or dispose of all Merchandise.

² “Merchandise” refers to any and all merchandise related to (1) MBL: HLCUSHA2507APDP0, (2) MBL: HLCUSHA250833431; and (3) MBL: HLCUTPE250833828.

WHEREAS, in order to dispose of the Merchandise, TQL Global, in its capacity as customs broker, will be required to submit certain documentation to CBP on behalf of and in the name of Debtor, as the consignee and importer of record, to request the destruction of the Merchandise, and it will be necessary for TQL Global to sign such documentation on behalf of the Debtor as its attorney-in-fact.

NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE, AND UPON APPROVAL AND ENTRY OF THIS STIPULATION BY THE COURT, IT IS HEREBY ORDERED AS FOLLOWS:

1. The above recitals are incorporated by reference into this Stipulation and Agreed Order.
2. Pre-petition, Debtor abandoned any and all interests in the Merchandise pursuant to the Abandonment Letter.
3. The Merchandise is not property of the Estate.
4. TQL Global is authorized, and is granted relief from the automatic stay (to the extent applicable), to act under the appointment and authority granted in the POA to effectuate the disposal and/or destruction of the Merchandise, including, without limitation, acting as lawful agent and attorney-in-fact of Debtor for and in the name of Debtor to sign and submit any and all documentation to CBP on behalf of Debtor and to take any and all other actions necessary and appropriate to effectuate the disposal and/or destruction of the Merchandise.
5. The Court retains exclusive jurisdiction to interpret and enforce this Order and to hear and determine any and all disputes arising from this Order.

Dated:

Christopher Lopez
United States Bankruptcy Judge

Stipulated and Agreed to By:

Dated: December 19, 2025

By: /s/ Hugh Massey Ray, III*
Hugh Massey Ray, III (TX Bar No. 24004246)
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PILLSBURY WINTHROP SHAW PITTMAN LLP
609 Main, Suite 2000
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Attorneys for Debtors

Dated: December 19, 2025

By: /s/ Yosina M. Lissebeck
Yosina M. Lissebeck (CA Bar No. 201654)
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DINSMORE & SHOHL LLP
655 West Broadway, Ste 800
San Diego, California 92101
Tel: (619) 400-0500
Fax: (619) 400-0501
Attorneys for Creditor TQL Global, LLC

*Signed with permission

EXHIBIT A



Electric Cars for Everyone.

November 12, 2025

Hapag-Lloyd (America) LLC
Meredith Baird
Supervisor, Import Customer Service
3 Ravinia Drive
Atlanta, GA 30346 USA
Meredith.Baird@hlag.com

TQL Global, LLC
Ty McEliece
International Group Sales Manager
100 Beecham Dr. Suite 100
Pittsburgh, PA 15205 USA
tmceliece@tql.com

Meredith and Ty,

This letter serves as a formal notification that Ample, Inc., as the consignee and importer of record of the merchandise below, hereby voluntarily abandons all ownership and claims to the following merchandise outlined by Master Bill of Lading (MBL) in the shipments below:

- **Importer of Record name and address:** Ample, Inc., 100 Hooper St., STE 35, San Francisco, CA 94107
- **Port of Entry:** USOAK
- **Shipment Details**
 - **MBL:** HLCUSHA2507APDP0
 - **Detailed description of the merchandise:** PET Blister Tray
 - **Container #:** HLBU3139490
 - **MBL:** HLCUSHA250833431
 - **Detailed description of the merchandise:** Machine Parts
 - **Container #s:** HLXU8335039, UACU5699330
 - **MBL:** HLCUTPE250833828
 - **Detailed description of the merchandise:** End of Line Buffer (machine parts)
 - **Container #:** HLBU3142641

Ample acknowledges and understands that by abandoning this cargo, it waives all rights to the merchandise, agrees that the carrier may dispose of the goods in any manner it chooses, and accepts full responsibility for any costs, including but not limited to storage, handling, and disposal fees, incurred by the carrier or customs authorities as a result of this abandonment.

Sincerely,

A handwritten signature in black ink, appearing to read 'John de Souza'.

John de Souza
President
Ample, Inc.







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Audit trail

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