

**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)
	§	

**WITNESS AND EXHIBIT LIST FOR DECEMBER 18, 2025 HEARING**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) hereby file this Witness and Exhibit List for the hearing to be held **December 18, 2025, at 2:00 p.m. (prevailing Central Time)** (the “Hearing”).

**WITNESS LIST**

The Debtors may call the following witnesses at the Hearing:

1. John D. Baumgartner, Co-Chief Restructuring Officer.
2. Ann Huynh, Co-Chief Restructuring Officer
3. A representative of the Debtor.
4. Any witness called by any other party.
5. Any witness(es) necessary to rebut the testimony of any witness(es) called or designated by any other party.

<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 List is available on (a) the Court’s website, at [www.txs.uscourts.gov](http://www.txs.uscourts.gov) and (b) the website maintained by the Debtors’ claims and noticing agent, Verita Global at <https://veritaglobal.net/ample>.



**EXHIBIT LIST**

The Debtors may offer into evidence any one or more of the following exhibits at the Hearing:

<b>Exhibit</b>	<b>Description</b>	<b>Offer</b>	<b>Object</b>	<b>Admit</b>	<b>Disposition</b>
1.	Declaration of John D. Baumgartner, Chief Restructuring Office (ECF #2)				
2.	Corporate Organization Chart (ECF #2)				
3.	DIP Term Sheet (ECF #5, Exhibit A)				
4.	DIP Budget (ECF #5-1, Exhibit 1)				
5.	Utility Services List (ECF #6-1)				
6.	Cash Schematic (ECF #9, Exhibit A)				
7.	Debtor Bank Accounts (ECF #9, Exhibit B)				
8.	Letters of Credit Schedule (ECF #9 Exhibit C)				
9.	Insurance Policy List (ECF #9, Exhibit D)				
	Any document produced by Petitioning Creditors in response to formal and informal discovery requests				
	Any exhibit identified or offered by any other party.				
	Any exhibit necessary for impeachment and/or rebuttal purposes.				

**RESERVATION OF RIGHTS**

The Debtors reserve the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserves the right to supplement this Witness and Exhibit List before the Hearing.

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***