

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CTN Holdings, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10603 (TMH)

(Jointly Administered)

Related Docket No. 9

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' MOTION FOR
ENTRY OF AN ORDER (I) AUTHORIZING DEBTORS TO SEAL CERTAIN
PERSONALLY IDENTIFIABLE INFORMATION FOR INDIVIDUALS
AND (II) GRANTING RELATED RELIEF**

The undersigned hereby certifies as follows:

1. On March 31, 2025, the above-captioned debtors and debtors in possession (the "Debtors") filed the *Debtors' Motion for Entry of an Order (I) Authorizing Debtors to Seal Certain Personally Identifiable Information for Individuals and (II) Granting Related Relief* [Docket No. 9] (the "Motion"), with the United States Bankruptcy Court for the District of Delaware (the "Court"). Attached thereto as Exhibit A was a proposed form order granting the relief requested in the Motion on a final basis (the "Proposed Final Order").
2. Prior to the First Day hearing, the Debtors received informal comments to the Motion and the Proposed Final Order from the Office of the United States Trustee ("Trustee").
3. Attached as **Exhibit A** hereto is a proposed amended Final Order (the "Proposed Amended Order") that addresses the comments made by the Trustee.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are CTN Holdings, Inc. (9122); CTN SPV Holdings, LLC (8689); Catona Climate Solutions, LLC (3375); Make Earth Green Again, LLC (4441); Aspiration QFZ, LLC (1532); Zero Carbon Holdings, LLC (1679); Aspiration Fund Adviser, LLC (4214). The Debtors' mailing address is 548 Market Street, PMB 72015, San Francisco, CA 94101-5401.



251060325040300000000005

4. For the convenience of the Court and all parties in interest, a redline of the Proposed Amended Order marked against the Final Order is attached hereto as **Exhibit B**.

WHEREFORE, the Debtors respectfully request that the Proposed Amended Final Order, substantially in the form attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

Dated: April 3, 2025
Wilmington, Delaware

Respectfully submitted,

/s/ William F. Taylor, Jr.

WHITEFORD, TAYLOR & PRESTON LLC²

William F. Taylor, Jr. (DE No. 2936)
600 North King Street, Suite 300
Wilmington, Delaware 19801
Telephone: (302) 353-4144
Facsimile: (302) 661-7950
Email: wtaylor@whitefordlaw.com

WHITEFORD, TAYLOR & PRESTON, L.L.P.

David W. Gaffey (admitted *pro hac vice*)
Brandy M. Rapp (admitted *pro hac vice*)
J. Daniel Vorsteg (admitted *pro hac vice*)
Joshua D. Stiff (admitted *pro hac vice*)
Alexandra G. DeSimone (admitted *pro hac vice*)
3190 Fairview Park Drive, Suite 800
Falls Church, Virginia 22042-4510
Telephone: (703) 280-9260
Email: dgaffey@whitefordlaw.com
brapp@whitefordlaw.com
jdvorsteg@whitefordlaw.com
jstiff@whitefordlaw.com
adesimone@whitefordlaw.com

Proposed Counsel to the Debtors and Debtors in Possession

² Whiteford, Taylor & Preston operates as Whiteford, Taylor & Preston LLC in Delaware.

EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CTN HOLDINGS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10603 (TMH)
(Jointly Administered)

Related Docket No. 9

**ORDER (I) AUTHORIZING DEBTORS TO SEAL
CERTAIN PERSONALLY IDENTIFIABLE INFORMATION
FOR INDIVIDUALS AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)² of the above-captioned debtors and debtors in possession (the “Debtors”) for entry of an order (this “Order”) (i) authorizing the Debtors to redact certain personally identifiable information for the Debtors’ creditors and parties in interest, and (ii) granting related relief, all as more fully set forth in the Motion; and due and sufficient notice of the Motion having been provided under the particular circumstances; and this Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012; and consideration of the Motion and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b)(2); and venue being proper before this Court under 28 U.S.C. §§ 1408 and 1409; and this Court having found and determined that the relief requested in the Motion is in the best interests of the Debtors, their estates and creditors, and any parties in interest; and the legal and factual bases set forth in the Motion having established just

¹ The Debtors in these chapter 11 cases, along with the last four digits of the Debtors’ federal tax identification numbers, are CTN Holdings, Inc. (9122), CTN SPV Holdings, LLC (8689), Make Earth Green Again, LLC (4441), Aspiration QFZ, LLC (1532), Aspiration Fund Adviser, LLC (4214), Catona Climate Solutions, LLC (3375) and Zero Carbon Holdings, LLC (1679). The mailing address for the Debtors is 548 Market Street, PMB 72015, San Francisco, CA 94101-5401.

² Capitalized terms not defined in this Order shall have the meanings ascribed to them in the Motion.

cause for the relief granted herein; and after due deliberation thereon and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED, as modified by the terms of this Order.
2. The Debtors are authorized to redact on the Creditor Matrix, the Schedules and Statements of Financial Affairs, affidavits of service, and any other documents filed with the Court or otherwise made available to the public the mailing and email addresses of natural persons, including individual creditors and individual equity holders. The Debtors shall file unredacted versions of any documents redacted pursuant to this Order under seal with the Clerk's office. The Debtors shall provide an unredacted version of any filings redacted pursuant to this Order to (a) the Court, (b) the U.S. Trustee, (c) counsel to any official committee appointed in these chapter 11 cases, (d) the claims and noticing agent, and (e) any party in interest upon a written request to the Debtors or to the Court that is reasonably related to these chapter 11 cases, provided that any party receiving such unredacted material shall first acknowledge in writing that it has reviewed and is bound by the terms of this Order.
3. Nothing in this Order shall waive or otherwise limit the service of any document upon or the provision of any notice to any natural person whose personally identifiable information is sealed or redacted pursuant to this Order. Service of all documents and notices upon individuals whose personally identifiable information is sealed or redacted pursuant to this Order shall be confirmed in the corresponding certificate of service.
4. To the extent a party in interest files a document on the docket in these chapter 11 cases that is required to be served on creditors whose information is under seal pursuant to this Order,

such party in interest should contact counsel for the Debtors who shall work in good faith, with the assistance of the Debtors' claims and noticing agent, to effectuate the service on such party's behalf.

5. Any party receiving unredacted material pursuant to this Order shall not (i) transfer or otherwise provide such unredacted material to any person or entity not party to the request, unless otherwise required to be disclosed by law or court order, or (ii) publicly disclose any such unredacted information in any pleading or other filing with the Court unless such document is filed under seal. The Debtors shall inform the U.S. Trustee promptly after denying any request for an unredacted document pursuant to this Order.

6. The Debtors shall file a redacted version of the Creditor Matrix and the Schedules and Statements and any other document redacted pursuant to this Order, and shall post the redacted versions of such documents on the website maintained by the claims agent.

7. Nothing herein precludes a party in interest's right to file a motion requesting that the Court unseal the information redacted by this Order.

8. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

9. The requirements of Bankruptcy Rule 6003(b) have been satisfied because the relief set forth in this Order is necessary to avoid immediate and irreparable harm.

10. Notwithstanding Bankruptcy Rule 6004(h), this Order shall be effective and enforceable immediately upon its entry.

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

EXHIBIT B

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

Style Definition: Normal

In re:

CTN HOLDINGS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-~~10603~~-10603 (TMH)
(Joint Administration Requested)

Related Docket No. 9

**ORDER (I) AUTHORIZING DEBTORS TO SEAL
CERTAIN PERSONALLY IDENTIFIABLE INFORMATION
FOR INDIVIDUALS AND (II) GRANTING RELATED RELIEF**

Upon the motion (the "Motion")² of the above-captioned debtors and debtors in possession (the "Debtors") for entry of an order (this "Order") (i) authorizing the Debtors to redact certain personally identifiable information for the Debtors' creditors and parties in interest, and (ii) granting related relief, all as more fully set forth in the Motion; and due and sufficient notice of the Motion having been provided under the particular circumstances; and this Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated as of February 29, 2012; and consideration of the Motion and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b)(2); and venue being proper before this Court under 28 U.S.C. §§ 1408 and 1409; and this Court having found and determined that the relief requested in the Motion is in the best interests of the Debtors, their estates and creditors, and any parties in interest; and the legal and factual bases set forth in the Motion having established just

¹ The Debtors in these chapter 11 cases, along with the last four digits of the Debtors' federal tax identification numbers, are CTN Holdings, Inc. (9122), CTN SPV Holdings, LLC (8689), Make Earth Green Again, LLC (4441), Aspiration QFZ, LLC (1532), Aspiration Fund Adviser, LLC (4214), Catona Climate Solutions, LLC (3375) and Zero Carbon Holdings, LLC (1679). The mailing address for the Debtors is 548 Market Street, PMB 72015, San Francisco, CA 94101-5401.

² Capitalized terms not defined in this Order shall have the meanings ascribed to them in the Motion.

cause for the relief granted herein; and after due deliberation thereon and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED ~~as set forth herein, as modified by the terms of this Order.~~

2. ~~The Debtors are authorized to redact from any Sealed Filings on the Creditor Matrix, the Schedules and the claims register the home Statements of Financial Affairs, affidavits of service, and any other address information of the Debtors' creditors, employees, former employees, equity holders, and other parties in interest who are documents filed with the Court or otherwise made available to the public the mailing and email addresses of natural persons, including individual persons.~~

3. ~~creditors and individual equity holders.~~ The Debtors shall file unredacted versions of all such Sealed Filings and any documents redacted pursuant to this Order under seal with the Clerk's office. The Debtors shall provide an unredacted ~~versions to~~ version of any filings redacted pursuant to this Order to (a) the Court, (b) the U.S. Trustee, (c) counsel to any official committee appointed in these chapter 11 cases, ~~or as otherwise ordered by the Court. The Debtors may provide an unredacted version of the Sealed Filings to other parties in interest upon execution of an acceptable non-disclosure agreement as necessary.~~

4.2. ~~To the extent (d) the claims and noticing agent, and (e) any party in interest upon a written request to the Debtors or to the Court that is reasonably related to these chapter 11 cases, provided with an unredacted version of any document filed under seal files any responsive pleading or other pleadings relating to the Motion, such party shall redact from its pleadings any confidential~~

Formatted: Condensed by 0.1 pt

Formatted: Font: 11 pt, Not Expanded by / Condensed by

~~or identifying information that any party receiving such unredacted material shall first acknowledge in writing that it has reviewed and is bound by the terms of this Order.~~

Formatted: Font: Not Bold

3. Nothing in this Order shall waive or otherwise limit the service of any document upon or the provision of any notice to any natural person whose personally identifiable information is sealed or redacted pursuant to this Order. Service of all documents and notices upon individuals whose personally identifiable information is sealed or redacted pursuant to this Order shall be confirmed in the corresponding certificate of service.

4. To the extent a party in interest files a document on the docket in these chapter 11 cases that is required to be served on creditors whose information is under seal pursuant to this Order, such party in interest should contact counsel for the Debtors who shall work in good faith, with the assistance of the Debtors' claims and noticing agent, to effectuate the service on such party's behalf.

5. Any party receiving unredacted material pursuant to this Order shall not (i) transfer or otherwise provide such unredacted material to any person or entity not party to the request, unless otherwise required to be disclosed by law or court order, or (ii) publicly disclose any such unredacted information in any pleading or other filing with the Court unless such document is filed under seal. The Debtors shall inform the U.S. Trustee promptly after denying any request for an unredacted document pursuant to this Order.

6. The Debtors shall file a redacted version of the Creditor Matrix and the Schedules and Statements and any other document redacted pursuant to this Order, and shall post the redacted versions of such documents on the website maintained by the claims agent.

7. Nothing herein precludes a party in interest's right to file a motion requesting that the Court unseal the information redacted by this Order.

Formatted: Font: 11 pt, Not Expanded by / Condensed by

5-8. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

6-9. The requirements of Bankruptcy Rule 6003(b) have been satisfied because the relief set forth in this Order is necessary to avoid immediate and irreparable harm.

7-10. Notwithstanding Bankruptcy Rule 6004(h), this Order shall be effective and enforceable immediately upon its entry.

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

§

Formatted: Font: 11 pt, Not Bold, Font color: Auto

Formatted: Normal, Left, Line spacing: single, No bullets or numbering, Font Alignment: Auto, Tab stops: Not at 0.45"

§

Formatted: Font: 11 pt, Not Expanded by / Condensed by