

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Hearing Date: December 11, 2023 at 2:00 p.m. (ET)
Obj. Deadline: November 27, 2023 at 4:00 p.m. (ET)

**DEBTORS' FIRST OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CERTAIN
(I) DUPLICATE CLAIMS, (II) INSUFFICIENT DOCUMENTATION CLAIMS,
(III) INCORRECT DEBTOR CLAIMS AND (IV) LATE-FILED CLAIMS**

THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE AND/OR MODIFY CERTAIN CLAIMS. CLAIMANTS RECEIVING THIS OBJECTION SHOULD REVIEW THIS OBJECTION AND THE ATTACHMENTS HERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR CLAIMS. CLAIMANTS SHOULD LOCATE THEIR NAMES AND CLAIMS ON SCHEDULE 1, SCHEDULE 2, SCHEDULE 3 AND/OR SCHEDULE 4 TO EXHIBIT A ATTACHED HERETO AND, IF APPLICABLE, FILE A RESPONSE BY THE RESPONSE DEADLINE FOLLOWING THE INSTRUCTIONS SET FORTH HEREIN. THE RELIEF SOUGHT HEREIN IS WITHOUT PREJUDICE TO THE DEBTORS' RIGHTS TO PURSUE FURTHER SUBSTANTIVE OR NON-SUBSTANTIVE OBJECTIONS AGAINST CERTAIN CLAIMS LISTED ON SCHEDULE 1, SCHEDULE 2, SCHEDULE 3 AND/OR SCHEDULE 4 TO EXHIBIT A ATTACHED HERETO.

The debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases hereby file this omnibus objection (this “**Objection**”) and respectfully state as follows:

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.



RELIEF REQUESTED

1. By this Objection, the Debtors seek entry of an order, substantially in the form attached hereto as **Exhibit A** (the “**Proposed Order**”), disallowing and expunging or otherwise modifying certain proofs of claim identified on: (a) **Schedule 1** (the “**Duplicate Claims**”); (b) **Schedule 2** (the “**Insufficient Documentation Claims**”); (c) **Schedule 3** (the “**Incorrect Debtor Claims**”); and (d) **Schedule 4** (the “**Late-Filed Claims**,” collectively with the Duplicate Claims, the Insufficient Documentation Claims, and the Incorrect Debtor Claims, the “**Disputed Claims**”)², each attached to the Proposed Order. In support of this Objection, the Debtors submit the *Declaration of Constadinos D. Tsitsis in Support of Debtors’ First Omnibus (Non-Substantive) Objection to Certain (i) Duplicate Claims, (ii) Insufficient Documentation Claims, (iii) Incorrect Debtor Claims, and (iv) Late-Filed Claims* (the “**Tsitsis Declaration**”), attached hereto as **Exhibit B**.

JURISDICTION

2. This Court has jurisdiction to consider this Objection under 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 February 29, 2012 (Sleet, C.J.). This is a core proceeding under 28 U.S.C. § 157(b). Venue of these Chapter 11 Cases (as defined below) and this Objection is proper in this District under 28 U.S.C. §§ 1408 and 1409.

3. The predicates for the relief requested by this Objection are section 502 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 3007-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”).

² Note that Disputed Claims may be listed on more than one schedule attached to the Proposed Order.

4. Pursuant to Local Rule 9013-1(f), the Debtors consent to the entry of a final judgment or order with respect to this Objection if it is determined that this Court lacks Article III jurisdiction to enter such final order or judgment absent consent of the parties.

BACKGROUND

5. On June 27, 2023 (the “**Petition Date**”), the Debtors filed voluntary petitions in this Court commencing these cases (the “**Chapter 11 Cases**”), which are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b). The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. The Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”) appointed, pursuant to section 1102 of the Bankruptcy Code, (a) an official committee of unsecured creditors (the “**Creditors’ Committee**”) on July 11, 2023, (b) an official committee of equity security holders (the “**Equity Committee**”) on September 7, 2023. No trustee or examiner has been appointed in these Chapter 11 Cases.

6. Additional information about the Debtors’ businesses and affairs, capital structure and prepetition indebtedness, and the events leading to the Petition Date, are in the *Declaration of Adam Kroll in Support of Debtors’ Petitions and Requests for First Day Relief* [D.I. 15].

CLAIMS PROCESS

7. On June 28, 2023, the Court entered an order authorizing the Debtors to retain and employ Kurtzman Carson Consultants LLC (“**KCC**”) as its claims and noticing agent [D.I. 54], and on July 25, 2023, the Court entered an order authorizing KCC to be the Debtors’ administrative advisor under 11 U.S.C. § 327(a) [D.I. 174].

8. On August 1, 2023, the Debtors filed their schedules of assets and liabilities and statements of financial affairs [D.I. 210-17], which were subsequently amended [D.I. 377-385]

on September 7, 2023 and may be further amended from time to time (collectively, as amended, supplemented, or further amended, the “**Schedules**”).

9. On August 24, 2023, the Court entered the *Order (A) Establishing Bar Dates and Related Procedures for Filing Proofs of Claim, Including Claims Arising Under Section 503(b)(9) of the Bankruptcy Code, (B) Approving the Form, Manner, and Procedures of Notice Thereof, and (C) Granting Related Relief* [D.I. 319] (the “**Bar Date Order**”).

10. The Bar Date Order established, among other things: (a) October 10, 2023 at 5:00 p.m. (prevailing Eastern Time) as the deadline to file proofs of claim in the Chapter 11 Cases for persons or entities (except governmental units (as such term is defined in section 101(27) of the Bankruptcy Code)) (the “**General Bar Date**”); (b) December 26, 2023 at 5:00 p.m. (prevailing Eastern Time) as the deadline for governmental units to file proofs of claim in the Chapter 11 Cases (the “**Governmental Bar Date**”); (c) the Rejection Bar Date (as defined in the Bar Date Order) as the later of: (a) the General Bar Date or the Governmental Bar Date (if a governmental unit is the counterparty to the applicable executory contract or unexpired lease) and (b) 5:00 p.m. (prevailing Eastern Time) on the date that is thirty (30) days after the service of an order of the Court authorizing the Debtors’ rejection of the applicable executory contract or unexpired lease; and (d) the Amended Schedule Bar Date (as defined in the Bar Date Order, and together with the General Bar Date, the Governmental Bar Date, and the Rejection Bar Date, the “**Bar Dates**”) as the later of (a) the General Bar Date or the Governmental Bar Date (if the applicable amendment relates to a claim of a Governmental Unit) and (b) 5:00 p.m. (prevailing Eastern Time) on the date that is 30 days after the claimant is served with notice of the applicable amendment or supplement to the Debtors’ schedules.

11. On August 28, 2023, the Debtors filed the *Notice of Deadlines for Filing Proofs of Claim, Including Claims Arising Under Section 503(b)(9) of the Bankruptcy Code Against Debtors* [D.I. 335] (the “**Bar Date Notice**”).

12. In accordance with the Bar Date Order, on August 31, 2023, KCC served the Bar Date Notice and proof of claim forms, via email and/or first-class mail to all creditors and any other known holders of potential claims in these Chapter 11 Cases and their counsel (if known). KCC also served the Bar Date Notice to all known registered holders of Lordstown Motors Corp. common stock and preferred stock, and any holders for whose benefit such registered holder holds down the chain of ownership for all such holders of common or preferred stock. Further, the Bar Date Notice was published in the *The Wall Street Journal* and *Automotive News* on August 31, 2023 and September 11, 2023, respectively. [D.I. 591]

13. The claims register for these Chapter 11 Cases (the “**Claims Register**”), prepared and maintained by KCC, shows that over 1,609 proofs of claim have been filed against the Debtors as of the filing of this Objection.

14. In the ordinary course of business, the Debtors maintain books and records (the “**Books and Records**”) that generally reflect, among other things, the nature and amount of the liabilities owed to their creditors. The Debtors, with the assistance of their advisors, have actively begun reviewing and reconciling proofs of claim with the Debtors’ Schedules and Books and Records, which process includes identifying certain categories of claims that may be subject to objection, disallowance, and expungement. While this analysis and reconciliation is ongoing, the Debtors have determined that the Disputed Claims should be disallowed for one or more reasons. Accordingly, the Debtors file this Objection seeking the relief requested below.

BASIS FOR RELIEF REQUESTED

15. Section 502(a) of the Bankruptcy Code provides that a filed proof of claim is “deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). When asserting a proof of claim against a bankrupt estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the claimant. *In re Allegheny Int’l, Inc.*, 954 F.2d 167, 173 (3d Cir. 1992). Where the claimant alleges sufficient facts to support its claim, its claim is afforded *prima facie* validity. *Id.* A party wishing to dispute a claim’s validity must produce evidence sufficient to negate the claim’s *prima facie* validity. *Id.* at 173-74. Once an objecting party produces such evidence, the burden shifts back to the claimant to prove the validity of his or her claim by a preponderance of the evidence. *Id.* at 174. Ultimately, the burden of persuasion is on the claimant. *Id.*

A. Duplicate Claims

16. As set forth in the Tsitsis Declaration, based upon a review and analysis of the Duplicate Claims listed on **Schedule 1** to the Proposed Order, the Debtors have determined that each Duplicate Claim was filed by or on behalf of the same claimant, in the same amount and priority on account of the same alleged liability and against the same Debtor³ more than once. The claims listed under the column “Duplicate Claim to be Disallowed” are duplicative of the corresponding claims listed under the column titled “Surviving Claim” (the “**Surviving Claims**”).

17. The Debtors should not be required to pay twice on the same obligation. Disallowance of these redundant claims will enable the Claims Register to reflect more accurately the claims asserted against the Debtors. Any disallowance of the Duplicate Claims

³ In certain instances, a claimant may not have identified a Debtor entity against which a claim was asserted. Pursuant to paragraph 11(c) of the Bar Date Order, claims that do not identify any Debtor are deemed asserted and filed against Lordstown Motors Corp.

will not prejudice any claimants or their substantive rights against the Debtors because each Surviving Claim will remain on the Claims Register, subject to the Debtors' ongoing rights to object to the Surviving Claims on these or any other applicable grounds, including other grounds set forth in the Debtors' subsequent omnibus objections.

18. Therefore, the Debtors (a) object to the Duplicate Claims listed on **Schedule 1** to the Proposed Order and (b) requests that such Duplicate Claims under the column heading labeled "Duplicate Claim to be Disallowed" be disallowed in their entirety.⁴

B. Insufficient Documentation Claims

19. Based upon a review and analysis of the Insufficient Documentation Claims listed on **Schedule 2** to the Proposed Order, and as set forth in the Tsitsis Declaration, the Debtors have determined that each Insufficient Documentation Claim lacks any supporting documentation for the existence and/or amount of the underlying claims. The Insufficient Documentation Claims are not *prima facie* valid. Pursuant to Bankruptcy Rule 3001(c), a claimant that files a proof of claim based on a writing must file an original or duplicate of the writing with the proof of claim or otherwise explain that the writing has been lost or destroyed. Only a proof of claim filed in accordance with Bankruptcy Rule 3001 constitutes *prima facie* evidence of its validity and amount.

20. Moreover, the Tsitsis Declaration explains that the Debtors, their professionals, and KCC have reviewed and made reasonable efforts to research the Insufficient Documentation Claims, including through a review of (a) the Debtors' books and records, which are maintained in the ordinary course of business by the Debtors, which do not reflect the existence of the

⁴ For the avoidance of doubt, the Debtors all rights to object to the Surviving Claims on any grounds permitted under applicable law.

asserted Insufficient Documentation Claims and (b) the proofs of claims asserting the Insufficient Documentation Claims, which provide no basis or appropriate supporting documentation on which the Debtors can determine that a valid claim exists. As such, the Debtors believe the Insufficient Documentation Claims do not provide *prima facie* evidence of the existence, validity and amount of such claims.

21. Failure to disallow the Insufficient Documentation Claims will result in the applicable claimants receiving an unwarranted recovery to the detriment of other creditors. Therefore, the Debtors (a) object to the allowance of the Insufficient Documentation Claims set forth on **Schedule 2** to the Proposed Order and (b) seek entry of the Proposed Order disallowing and expunging the Insufficient Documentation Claims.⁵

C. **Incorrect Debtor Claims**

22. As set forth in Tsitsis Declaration, the Debtors have thoroughly reviewed their Books and Records and the Claims Register, and based on their reasonable review, have determined that each Incorrect Debtor Claim identified on **Schedule 3** to the Proposed Order is duplicate of other claim and does not accurately reflect the actual Debtor entity that may be liable for the underlying claims for the specific reasons set forth on **Schedule 3**. The Incorrect Debtor Claims should be disallowed, and the Claims under the heading labeled, “Correct Debtor” set forth in **Schedule 3** should remain on the Claim Register as they are against the correct Debtor that may be liable (the “**Corrected Debtor Claims**”). Disallowing the Incorrect Debtor Claims and with the Corrected Debtor Claims as the remaining claims will not prejudice

⁵ To the extent that any of the claimants provide additional documentation with respect to the Insufficient Documentation Claims in response to this Objection, the Debtors reserve all rights to contest that such additional documentation should not be permitted and the claim should be disallowed as the claimant failed to meet its burden in a timely manner. However, to the extent that any of the additional documentation is provided and the claim is held to constitute a timely filed proof of claim that is *prima facie* valid, the Debtors reserve all rights to further object to the proof of claim on any grounds permitted under applicable law.

the holders of the Incorrect Debtor Claims, as the Corrected Debtor Claims will remain against the appropriate Debtor entity. Failure to disallow the Incorrect Debtor Claims might arguably prejudice the Debtors and other stakeholders if a claimant seeks to pursue the Debtors in another jurisdiction for a claim which a respective Debtor bears no liability. Moreover, disallowance of these claims will enable the Debtors to maintain a Claims Register in these Chapter 11 Cases that more accurately reflects the claims that exist against the Debtors.

D. Late-Filed Claims

23. The Bar Date Order established October 10, 2023 as the General Bar Date for all holders of claims (except governmental units and with certain other exceptions) to assert a claim against the Debtors that arose before the Petition Date. KCC provided timely served the Bar Date Order and Bar Date Notice to each claimant of a Late-Filed Claim in accordance with the procedures set forth therein. The claims listed on Schedule 4 under the heading labeled “Late Claim to be Disallowed” arose prior to the Petition Date, were filed after the General Bar Date and therefore, do not comply with the Bar Date Order. The Debtors have examined each of the Late-Filed Claims, which were filed on October 22 and 23, respectively and determined that they are not specific amendments to any timely-filed claim.

24. Failure to disallow the Late-Filed Claims will result in the applicable claimant receiving an unwarranted recovery to the detriment of the Debtors and creditors who complied with the Bar Date Order and timely filed proofs of claim in these Chapter 11 Cases. Accordingly, the Debtors (a) object to the Late-Filed Claims listed on **Schedule 4** to the Proposed Order and (b) requests that such Late-Filed Claims under the column heading labeled “Late Claim to be Disallowed” be disallowed in their entirety.

Responses to this Objection

25. **Filing and Service of Responses:** To contest the Objection, a Claimant must file and serve a written response to the Objection (a “**Response**”) so that it is actually received by the Clerk of the Court and the parties in the following paragraph no later **than 4:00 p.m. (ET) on November [●], 2023** (the “**Response Deadline**”). Claimants should locate their names and claims on **Schedule 1**, **Schedule 2**, **Schedule 3** and/or **Schedule 4** to the Proposed Order, and carefully review the Objection. A Response must address each ground upon which the Debtors object to a particular Disputed Claim. A hearing to consider the Debtors’ Objection, if necessary, will be held on December 11, 2023 at 2:00 p.m. (ET), before the Honorable Mary F. Walrath, United States Bankruptcy Judge, via telephone and videoconference (the “**Hearing**”).

26. Each Response must be filed and served upon the following entities at the following addresses: (i) White & Case LLP, Southeast Financial Center, 200 South Biscayne Boulevard, Suite 4900, Miami, FL 33131 (Attn: Fan B. He (fhe@whitecase.com), 1221 Avenue of the Americas, New York, NY 10020 (Attn: David Turetsky (david.turetsky@whitecase.com)), and 555 South Flower Street, Suite 2700, Los Angeles, CA 90071 (Attn: Roberto Kampfner (rkampfner@whitecase.com), Doah Kim (doah.kim@whitecase.com), and RJ Szuba (rj.szuba@whitecase.com)), and (ii) Womble Bond Dickinson (US) LLP, 1313 North Market Street, Suite 1200, Wilmington, Delaware 19801 (Attn: Donald J. Detweiler (don.detweiler@wbd-us.com) and Morgan L. Patterson (morgan.patterson@wbd-us.com)).

27. **Content of Responses:** Each Response to this Objection must, at a minimum, contain the following information:

- i. a caption setting forth the name of the Court, the name of the Debtors, the case number, and the title of the Objection to which the Response is directed;

- ii. the name of the claimant, the claim number, and a description of the basis for the amount of the claim;
- iii. the specific factual basis and supporting legal argument upon which the party will rely in opposing this Objection;
- iv. all documentation and other evidence in support of the claim, not previously filed with the Court or the claims and noticing agent, upon which the claimant will rely in opposing this Objection; and
- v. the name, address, telephone number, fax number and/or email address of the person(s) (which may be the claimant or the claimant's legal representative) with whom counsel for the Debtors should communicate with respect to the claim or the Objection and who possesses authority to reconcile, settle, or otherwise resolve the objection to the claim on behalf of the claimant.

28. Timely Response Required; Hearing; Replies: If a Response is properly and timely filed and served in accordance with the above procedures, the Debtors will endeavor to reach a consensual resolution with the claimant. If no consensual resolution is reached, the Court will conduct a hearing with respect to the Objection and the Response on December 11, 2023 at 2:00 p.m. (ET) or such other date and time as parties filing Responses may be notified. Only those Responses made in writing and timely filed and received will be considered by the Court at any such hearing.

29. Adjournment of Hearing: The Debtors reserve the right to seek an adjournment of the hearing on any Response to this Objection, which adjournment will be noted on the notice of agenda for the hearing. The agenda will be served on the person designated by the Claimant in its Response.

30. If a claimant fails to timely file a Response by the Response Deadline, the Debtors may present to the Court an appropriate order disallowing and expunging or otherwise modifying the Disputed Claims without further notice to the claimant or a hearing.

31. Separate Contested Matter: To the extent a Response is filed regarding any claim listed in this Objection and the Debtors are unable to resolve the Response, the objection by the Debtors to such claim shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. Any order entered by the Court regarding an objection asserted in this Objection shall be deemed a separate order with respect to each claim subject thereto.

RESERVATION OF RIGHTS

32. The Debtors expressly reserve the right to amend, modify, or supplement this Objection, and to file additional objections to any other claims (filed or not) that may be asserted against the Debtors and their estates. Should one or more of the grounds of objection stated in the Objection be dismissed or overruled, the Debtors reserve the right to object to each of the Disputed Claims or any other proofs of claim on any other grounds that the Debtors discover or elect to pursue.

33. Notwithstanding anything contained in the Objection, or the exhibits and schedules attached hereto, nothing herein will be construed as a waiver of any rights that the Debtors, or any successor to the Debtors, may have to enforce rights of setoff against the claimants.

34. Nothing in this Objection shall be deemed: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party in interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Objection; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any of the

Debtors' claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

COMPLIANCE WITH LOCAL RULE 3007-1

35. To the best of the Debtors' knowledge and belief, this Objection complies with Local Rule 3007-1. To the extent this Objection does not comply in all respects with the requirements of Local Rule 3007-1, the undersigned believes such deviations are not material and respectfully requests that any such requirement be waived.

NOTICE

36. Notice of this Motion will be provided to (a) the U.S. Trustee; (b) counsel to Foxconn; (c) counsel to the Creditors' Committee; (d) counsel to the Equity Committee; (e) the Internal Revenue Service; (f) the Securities and Exchange Commission; (g) the United States Attorney for the District of Delaware; (h) the state attorneys general for all states in which the Debtors conduct business; (i) any parties who have asserted liens against the Debtors' assets; (j) the claimants that filed the Disputed Claims; and (k) any such other party entitled to receive notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, in light of the nature of the relief requested herein, no other or further notice need be given.

NO PREVIOUS REQUEST

37. No previous request for the relief sought herein has been made by the Debtors to this or any other court.

WHEREFORE the Debtors respectfully request that the Court sustain the Objection and grant such other and further relief as it deems just and proper.

Dated: November 10, 2023

Respectfully submitted,

/s/ Morgan L. Patterson

**WOMBLE BOND DICKINSON (US)
LLP**

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

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Hearing Date: December 11, 2023 at 2:00 p.m. (ET)

Objection Deadline: Nov. 27, 2023 at 4:00 p.m. (ET)

**NOTICE OF DEBTORS' FIRST OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO
CERTAIN (I) DUPLICATE CLAIMS, (II) INSUFFICIENT DOCUMENTATION
CLAIMS, (III) INCORRECT DEBTOR CLAIMS AND (IV) LATE-FILED CLAIMS**

PLEASE TAKE NOTICE that, on November 10, 2023, the debtors and debtors-in-possession in the above-captioned cases (collectively, the “**Debtors**”) filed the *Debtors’ First Omnibus (Non-Substantive) Objection to Certain (I) Duplicate Claims, (II) Insufficient Documentation Claims, (III) Incorrect Debtor Claims and (IV) Late Filed Claims* (the “**Objection**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). Your claim(s) may be modified and/or disallowed as a result of the Objection. Therefore, you should read the attached Objection carefully.

PLEASE TAKE FURTHER NOTICE THAT YOUR RIGHTS MAY BE AFFECTED BY THE OBJECTION AND BY ANY FURTHER CLAIM OBJECTION THAT MAY BE FILED BY THE DEBTORS OR OTHERWISE. THE RELIEF SOUGHT HEREIN IS WITHOUT PREJUDICE TO THE DEBTORS’ RIGHT TO PURSUE FURTHER OBJECTIONS AGAINST YOUR CLAIM(S) SUBJECT TO THE OBJECTION IN

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

**ACCORDANCE WITH APPLICABLE LAW AND APPLICABLE ORDERS OF THE
BANKRUPTCY COURT.**

PLEASE TAKE FURTHER NOTICE that, if the holder of a claim that is the subject of the Objection wishes to respond to the Objection, the holder must file a written response with the Clerk of the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 North Market Street, Wilmington, Delaware 19801 and serve it on the undersigned counsel so as to be received on or before on or before **November 27, 2023 at 4:00 p.m. (ET)**.

PLEASE TAKE FURTHER NOTICE that, responses to the Objection must contain, at a minimum, the following: (a) a caption setting forth the name of the Bankruptcy Court, the above referenced case number and the title of the Objection to which the response is directed; (b) the name of the claimant, his/her/its claim number, and a description of the basis for the amount of the claim; (c) the specific factual basis and supporting legal argument upon which the claimant will rely in opposing this Objection; (d) any supporting documentation, to the extent it was not included with the proof of claim previously filed with the clerk or claims agent, upon which the claimant will rely to support the basis for and amounts asserted in the proof of claim; and (e) the name, address, email address, telephone number, and fax number of the person(s) (which may be the claimant or the claimant's legal representative) with whom counsel for the Debtors should communicate with respect to the claim or the Objection and who possesses authority to reconcile, settle, or otherwise resolve the Objection to the disputed claim on behalf of the claimant.

PLEASE TAKE FURTHER NOTICE that, if no response to the Objection is timely filed and received in accordance with the above procedures, an Order may be entered sustaining the Objection without further notice or a hearing. If a response is properly filed, served and received in accordance with the above procedures and such response is not resolved, a hearing to consider

such response and the Objection will be held before The Honorable Mary F. Walrath, United States Bankruptcy Court, 824 North Market Street, 5th Floor, Courtroom 4, Wilmington, Delaware 19801 on **December 11, 2023 at 2:00 p.m. (ET)**. Only a response made in writing and timely filed and received will be considered by the Bankruptcy Court at the Hearing.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY SUSTAIN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

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Dated: November 10, 2023
Wilmington, Delaware

<p><u>/s/ Morgan L. Patterson</u> WOMBLE BOND DICKINSON (US) LLP Donald J. Detweiler (DE Bar No. 3087) Morgan L. Patterson (DE Bar No. 5388) 1313 North Market Street, Suite 1200 Wilmington, Delaware 19801 Telephone: (302) 252-4320 Facsimile: (302) 252-4330 don.detweiler@wbd-us.com morgan.patterson@wbd-us.com</p> <p><i>Proposed Counsel to the Debtors and Debtors in Possession</i></p>	<p>WHITE & CASE LLP Thomas E Lauria (admitted <i>pro hac vice</i>) Matthew C. Brown (admitted <i>pro hac vice</i>) Fan B. He (admitted <i>pro hac vice</i>) 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131 Telephone: (305) 371-2700 tlauria@whitecase.com mbrown@whitecase.com fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>) 1221 Avenue of the Americas New York, NY 10020 Telephone: (212) 819-8200 david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>) 111 South Wacker Drive, Suite 5100 Chicago, IL 60606 Telephone: (312) 881-5400 jzakia@whitecase.com</p> <p>Roberto Kampfner (admitted <i>pro hac vice</i>) Doah Kim (admitted <i>pro hac vice</i>) RJ Szuba (admitted <i>pro hac vice</i>) 555 South Flower Street, Suite 2700 Los Angeles, CA 90071 Telephone: (213) 620-7700 rkampfner@whitecase.com doah.kim@whitecase.com rj.szuba@whitecase.com</p> <p><i>Counsel to Debtors and Debtors in Possession</i></p>
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Exhibit A

Proposed Order

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

In re:

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**ORDER SUSTAINING DEBTORS' FIRST OMNIBUS (NON-SUBSTANTIVE)
OBJECTION TO CERTAIN (I) DUPLICATE CLAIMS, (II) INSUFFICIENT
DOCUMENTATION CLAIMS, (III) INCORRECT DEBTOR CLAIMS, AND
(IV) LATE-FILED CLAIMS**

Upon the *Debtors' First Omnibus (Non-Substantive) Objection to Certain (i) Duplicate Claims, (ii) Insufficient Documentation Claims, (iii) Incorrect Debtor Claims, and (iv) Late-Filed Claims* (the “**Objection**”),² of the debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), pursuant to Bankruptcy Code sections 105 and 502, Bankruptcy Rule 3007, and Local Rule 3007-1; and the Court having jurisdiction to consider the Objection 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 Objection and the relief requested therein being a core proceeding in

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Objection.

accordance with 28 U.S.C. § 157(b)(2); and venue being proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409; and notice of the Objection being adequate and appropriate under the particular circumstances; and the Court having considered the Tsitsis Declaration and found and determined that the relief sought in the Objection is in the best interests of the Debtors, the Debtors' estates and creditors, and other parties in interest and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Objection is sustained as provided herein.
2. Any Response to the Objection not otherwise withdrawn, resolved, or adjourned is overruled on the merits.
3. Each of the Duplicate Claims identified on **Schedule 1** attached hereto is disallowed in its entirety. The Duplicate Claims listed in the column titled "Surviving Claim" identified on **Schedule 1** hereto shall remain on the Claims Register, subject to the Debtors' further objections on any substantive or non-substantive grounds.
4. Each Insufficient Documentation Claim identified on **Schedule 2** attached hereto is disallowed and expunged in its entirety.
5. Each Incorrect Debtor Claim identified under the heading "Incorrect Debtor Claims" on **Schedule 3** attached hereto is disallowed in its entirety. The Correct Debtor Claims listed in the column titled "Correct Debtor" identified on a **Schedule 3** should remain on the Claims Register, subject to the Debtors' further objections on any substantive or non-substantive grounds.

6. Each of the Late-Filed Claims listed on **Schedule 4** attached hereto under the heading labeled “Late Claim to be Disallowed” are disallowed and expunged in its entirety.

7. The objection by the Debtors to the Disputed Claims, as addressed in the Objection and the schedule hereto, constitutes a separate contested matter with respect to each such claim, as contemplated by Bankruptcy Rule 9014 and Local Rule 3007-1. This Order shall be deemed a separate Order with respect to each Disputed Claim.

8. Any stay of this Order pending appeal by any holder of a Disputed Claim or any other party with an interest in such claims that are subject to this Order shall only apply to the contested matter which involves such party and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters arising from the Objection or this Order.

9. The Debtors, KCC, and the Clerk of this Court are authorized to modify the official Claims Register for these Chapter 11 Cases in compliance with the terms of this Order and to take all steps necessary or appropriate to carry out the relief granted in this Order.

10. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the claimants.

11. Nothing in the Objection or this Order, nor any actions or payments made by the Debtors pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors’ or any other party in interest’s right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest

in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any of the Debtors' claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

12. This Order is immediately effective and enforceable.

13. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.

Schedule 1

Duplicate Claims

In re Lordstown Motors Corporation, et al.

Schedule 1: Duplicate Claims

#	Name of Claimant	Surviving Claim					Duplicate Claim to be Disallowed					Reason for Disallowance
		Date Claim Filed	Claim Number	Debtor Name	Claim Amount	Claim Type	Date Claim Filed	Claim Number	Debtor Name	Claim Amount	Claim Type	
1	Filec Production SAS - Amphenol ZI Rue de Disse Airvault, Aquitaine 79600 France	10/10/23	1371	Lordstown EV Corporation	\$164,225.00	General Unsecured	10/10/2023	1372	Lordstown EV Corporation	\$164,225.00	General Unsecured	Claim No. 1372 is duplicative of Claim No. 1371
2	JVIS USA LLC 52048 Shelby Parkway Shelby Township, MI 48315	9/13/2023	265	Lordstown Motors Corp.	\$148,617.00	General Unsecured	9/12/2023	281	Lordstown Motors Corp.	\$148,617.00	General Unsecured	Claim No. 281 is duplicative of Claim No. 265
3	State of Michigan, Unemployment Insurance Agency, Tax Office 3024 W. Grand Blvd., Ste 12-650 Detroit, MI 48202	8/22/2023	24	Lordstown Motors Corp.	\$1,113.65	Priority	8/22/2023	25	Lordstown Motors Corp.	\$1,113.65	Priority	Claim No. 25 is duplicative of Claim No. 24
4	Thomas Skook 10260 Market St North Lima, OH 44452	10/4/2023	974	Lordstown Motors Corp.	\$100.00	General Unsecured	10/4/2023	1519	Lordstown Motors Corp.	\$100.00	General Unsecured	Claim No. 1519 is duplicative of Claim No. 974

Schedule 2

Insufficient Documentation Claims

In re Lordstown Motors Corporation, et al.**Schedule 2: Insufficient Documentation Claims**

Disallowed Claim							
#	Name of Claimant	Date Claim Filed	Claim Number	Debtor Name	Claim Amount	Claim Type	Reason for Disallowance
1	Abdelkader Bougar 607 - 328 Agnes Street New Westminster, BC V3L 0J4 Canada	10/6/2023	1155	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
2	Abdoul K Diop 5 Chicory Street Stewartstown, PA 17363	10/8/2023	1221	Lordstown Motors Corp.	\$5,832.37	Priority	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
3	Adeel Saddiqui 34 Hepburn Street Markham, ON L3S 3Z6 Canada	9/27/2023	724	Lordstown Motors Corp.	\$1,013.76	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
4	Akash Sharma 1823 Heritage Pass Milton, GA 30004	10/5/2023	1090	Lordstown Motors Corp.	\$230.70	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
5	Andre Horasanian Trust UA DTD 11/16/2 2279 Kelmscott Court Westlake Vlg, CA 91361	9/21/2023	548	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
6	Anthony Karnowski 314 Bowman Drive Kent, OH 44240	9/27/2023	737	Lordstown EV Corporation	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
7	Baba Traware 2510 Grants Lake Blvd. #114 Sugar Land, TX 77479	10/3/2023	933	Lordstown Motors Corp.	\$67,980.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.

8	Bashir Tanko 1401 Kings Hwy, Apt 339B Fairfield, CT 6824	10/1/2023	822	Lordstown Motors Corp.	\$45.38	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
9	Benjamin Gilles 11 Crisci Lane Highland, NY 12528	9/28/2023	755	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
10	Benjamin Sanabria 608 Cambridge CT Discovery Bay, CA 94505	9/12/2023	277	Lordstown EV Corporation	\$400.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
11	Boris Kagarlitskiy 2254 Wrenford Rd. Cleveland, OH 44118	9/29/2023	787	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
12	Brenda P Alfaro 1823 S Roberts Rd. Tempe, AZ 85281	10/5/2023	1094	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
13	Brian Canty 35 Folsom Ave Huntington Station, NY 11746	9/20/2023	528	Lordstown Motors Corp.	\$1,057.48	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
14	Brian Rankin 5186 Corduroy Rd Mentor, OH 44060	9/6/2023	68	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
15	Calvin J. Minkins 21518 Haylee Way Humble, TX 77338	9/25/2023	624	Lordstown Motors Corp.	\$0.07	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.

16	Cara Hafferty 118 Commercial St Braintree, MA 2184	9/21/2023	553	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
17	Charles L. & Lyona Hannahs 105 Main St Union, IA 50258	9/19/2023	482	Lordstown Motors Corp.	\$25.50	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
18	Charles Sandstrom 478 Tobin Alpha Rd Crystal Falls, MI 49920	10/2/2023	880	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
19	Charlie Johns 210 Grove Park Drive Burlington, ON L7T 2H4 Canada	9/16/2023	373	Lordstown Motors Corp.	\$14,131.67	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
20	Chinh V Hoang 10832 Blake St Garden Grove, CA 92843	10/3/2023	904	Lordstown Motors Corp.	\$100,701.61	Priority	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
21	Christabel Bryant 34 Village St South Easton, MA 2375	10/3/2023	905	Lordstown Motors Corp.	\$156,028.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
22	Columbia Diane Carfolo 7464 Drury Ln Canfield, OH 44406	10/5/2023	1095	Lordstown Motors Corp.	\$2,168.90	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
23	Craig Bauer 1 Troy Street Edison, NJ 8820	10/2/2023	843	Lordstown Motors Corp.	\$8,931.86	Priority	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.

24	Cynthia Beebe 11560 NW Highway Kk Appleton City, MO 64724-2326	9/14/2023	311	Lordstown Motors Corp.	\$3.09	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
25	Daniel Adams 354 Johnson Place Poland, OH 44514	10/4/2023	1027	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
26	David Callaway 2400 Johnson Ave Unit 3G Bronx, NY 10463	9/12/2023	243	Lordstown Motors Corp.	\$957.85	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
27	David Dzenutis 512 Cherry Brook Road Canton, CT 6019	10/1/2023	820	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
28	David H. Tyner 2898 Hwy 14 West Autaugaville, AL 36003	9/27/2023	730	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
29	Dennis Mugwanya 681 11th St Richmond, CA 94801	9/18/2023	445	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
30	Din B. Premy and Joyce R. Premy 82 Linton Street Nashua, NH 3060	9/19/2023	506	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
31	Dionald Tamara 4 Pleasant Park Close West Brooks, AB T1R 1H5 Canada	9/29/2023	812	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.

32	Donald Drake 2871 N Ocean Blvd V463 Boca Raton, FL 33431	10/5/2023	1075	Lordstown Motors Corp.	\$23,725.25	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
33	Donald R. Drake 2871 N. Ocean Blvd V463 Boca Raton, FL 33431	10/5/2023	1037	Lordstown Motors Corp.	\$32,128.06	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
34	Douglas Wargo 11119 Aquilla Rd Chardon, OH 44024	9/18/2023	422	Lordstown Motors Corp.	\$141.22	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
35	Douglas Wargo 11119 Aquilla Rd Chardon, OH 44024	9/18/2023	423	Lordstown Motors Corp.	\$341.22	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
36	Douglas Wargo 11119 Aquilla Rd Chardon, OH 44024	9/18/2023	425	Lordstown Motors Corp.	\$290.77	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
37	Dwayne L Adams 2093 Majestic Dr Canonsburg, PA 15317	9/26/2023	658	Lordstown Motors Corp.	\$17,000.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
38	Edelyn Saint Louis 27414 129th Pl SE Kent, WA 98030	9/26/2023	705	Lordstown Motors Corp.	\$635.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
39	Edward Fait 15412 Royal Oak Dr Middlefield, OH 440620-9029	9/15/2023	343	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.

40	Eric Knies 23118 Greencrest St. Saint Clair Shores, MI 48080	9/12/2023	235	Lordstown Motors Corp.	\$4,846.90	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
41	Farkhonda Sangar 4401 Haydock Park Dr Mississauga, ON L5M 3C2 Canada	9/26/2023	721	Lordstown Motors Corp.	\$11,080.37	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
42	Frangilan Patrick 2036 Martin Grove Road Toronto, ON M9V 4B6 Canada	9/12/2023	275	Lordstown Motors Corp.	\$213.34	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
43	Gagik Keshishi 2543 Montrose Ave Montrose, CA 91020	9/13/2023	304	Lordstown Motors Corp.	\$294.86	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
44	Garrett Baumann 3240 Welton Circle Roseville, CA 95747	9/24/2023	613	Lordstown Motors Corp.	\$1,013.98	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
45	Gary Krikorian 25922 Monte Royale Dr Mission Viejo, CA 92692	9/8/2023	150	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
46	Gary Wayne Browne 9265 122 Street Unit 31 Surrey, BC V3V 7R4 Canada	9/22/2023	558	Lordstown Motors Corp.	\$221.21	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
47	Gauri Agrawal 10147 N. Portal Ave. Cupertino, CA 95014	9/13/2023	298	Lordstown Motors Corp.	\$1,357.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.

48	George M Moats Sr 409 Sunshine Hollow Rd Uniontown, PA 15401	10/3/2023	961	Lordstown Motors Corp.	\$1,052.08	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
49	Graham Liechty Roth IRA 423 Shepherds Way Osceola, IN 46561	9/18/2023	417	Lordstown Motors Corp.	\$596.25	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
50	Gregory Scott Shank PO Box 104 Reedsport, OR 97467	10/4/2023	983	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
51	Harold Kallies 567 Idlewild Rd Crystal Falls, MI 49920	10/2/2023	885	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
52	Henry Taguba 4 Vauhgn Drive Welland, ON L3B 0G7 Canada	9/14/2023	325	Lordstown Motors Corp.	\$1,000.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
53	Hui Chan Liu 1601-6611 Southoaks Cres. Burnaby, BC V5E 4L5 Canada	10/10/2023	1308	Lordstown Motors Corp.	\$1,942.72	Administrative	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
54	Huyen T Nguyen 4967 Rice Drive San Jose, CA 95111	9/16/2023	371	Lordstown Motors Corp.	\$1,700.00	Administrative	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
55	James A Jacobs 126 Sarah Jane Dr Madison, AL 35757	10/9/2023	1283	Lordstown Motors Corp.	\$194.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.

56	James Claudius Smith 8703 Sunnyfield Dr Houston, TX 77099	10/4/2023	980	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
57	James Duhaime 2316 Raccoon Run Monroe, NC 28110	9/7/2023	126	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
58	James L. Morehead Sr 4135 Ave L Santa Fe, TX 77510	9/22/2023	571	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
59	Jeffrey W Marsee 14416 Andina Trl Fort Wayne, IN 46845	9/11/2023	210	Lordstown Motors Corp.	\$4.25	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
60	Jie Zheng 35 Kentley Street Markham, ON L6C 3G2 Canada	10/3/2023	955	Lordstown Motors Corp.	\$19,653.35	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
61	Joh Rojao 650 Kenwood Road Ridgewood, NJ 7450	9/10/2023	169	Lordstown Motors Corp.	\$1,718.54	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
62	John Bedford 6349 Chestnut Ave Orangevale, CA 95662	9/7/2023	131	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
63	John Chou and Yajane Chu, JT 1108 Ranchwood Pl Diamond Bar, CA 91765	9/29/2023	796	Lordstown Motors Corp.	\$50,000.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.

64	John Patrick Meegan PO Box 463 Baraboo, WI 53913	9/19/2023	484	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
65	John S D. Blasi & Patricia A D. Blasi 4 Spearfield Lane Lynnfield, MA 1940	10/12/2023	1483	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
66	John Steele 335 Warden Avenue Ottawa, ON K1E 1T3 Canada	10/9/2023	1247	Lordstown Motors Corp.	\$1.08	Administrative	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
67	Jonathan Clark 3509 Hanna Dr Memphis, TN 38128	9/12/2023	280	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
68	Jose B Ruiz 2 10th Ave Huntington, NY 11746	9/25/2023	635	Lordstown Motors Corp.	\$4,000.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
69	Joyce Jeanette Holmes 6015 Niles Rd Valders, WI 54245	10/12/2023	1499	Lordstown Motors Corp.	\$10,629.20	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
70	Jude Ezeigwe 7298 Tunbridge Dr New Albany, OH 43054	9/19/2023	476	Lordstown Motors Corp.	\$100.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
71	Julie Schroeder 114B Elk Street Santa Cruz, CA 95065	9/20/2023	520	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.

72	Jung-Jin LEE 1600 Hillsborough St Chula Vista, CA 91913	10/3/2023	934	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
73	Justin Saba 1717 Bel Air Rd Los Angeles, CA 90077	9/6/2023	99	Lordstown Motors Corp.	\$23.40	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
74	Kai Jin Huang 81 Wepawaug Rd Woodbridge, CT 6525	9/18/2023	400	Lordstown Motors Corp.	\$55.25	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
75	KalaWati Narayan 11235 81A Avenue Delta, BC V4C2A2 Canada	9/26/2023	674	Lordstown Motors Corp.	\$500.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
76	Kang Liu 2040 Lake Vista Court San Jose, CA 95148	9/20/2023	526	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
77	Kelli Codianne 610 7Th Street Boonville, MO 65233	9/7/2023	132	Lordstown EV Corporation	\$100.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
78	Kenneth Adams 354 Johnston Pl Poland, OH 44514	10/4/2023	1026	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
79	Kenneth Alcazar 17401 Devonshire St Northridge, CA 91325	9/23/2023	612	Lordstown Motors Corp.	\$9,440.50	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.

80	Kenton W. Riggs 2220 W Tripp Ave Peoria, IL 61604	10/10/2023	1353	Lordstown Motors Corp.	\$4,509.61	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
81	Kerry M. Powers 4411 Harrison Grade Rd Sebastopol, CA 95472	9/25/2023	618	Lordstown Motors Corp.	\$6,500.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
82	Kevin Kilpatrick 9 Roger Norton Pl Cranford, NJ 7016	9/27/2023	744	Lordstown Motors Corp.	\$773.03	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
83	Laurie L. Jordan 144 Sherwood St Portland, ME 4103	9/27/2023	734	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
84	Laurie L. Jordan 144 Sherwood St Portland, ME 4103	9/27/2023	736	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
85	Lone Pine Farms Inc 600 E Hillcrest Ave Apt 311 Indianola, IA 50125	9/18/2023	436	Lordstown Motors Corp.	\$9,614.84	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
86	Louise Prystaloski 23349 Hazeltine Dr Athens, AL 35613	9/18/2023	416	Lordstown Motors Corp.	\$2,200.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
87	Man Bum Hahn 13818 Estuary Dr Clarksburg, MD 20871	9/28/2023	758	Lordstown Motors Corp.	\$3,069.10	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.

88	Mark C Cleland 10927 Pendragon Place Raleigh, NC 27614	9/12/2023	252	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
89	Mark Cunliffe 140 Robinson St Apt 1002 Hamilton, ON L8P 4R6 Canada	9/17/2023	396	Lordstown Motors Corp.	\$221.86	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
90	Maryann Jamieson 2752 Pala Dura Drive Henderson, NV 89074	9/29/2023	831	Lordstown Motors Corp.	\$2,552.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
91	Md Mokarrom Hossain 1003-15 Orton Park Rd Scarborough, ON M1G 3G3 Canada	9/14/2023	340	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
92	Michael J Teuscher 4857 Regents Park Ln Fremont, CA 94538	9/15/2023	364	Lordstown Motors Corp.	\$357.60	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
93	Michael Pinterics 891 Smokey Lake Dr Phelps, WI 54554	10/2/2023	883	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
94	Michael T. Moore 2006 West 43rd Street #42 Houston, TX 77018	10/2/2023	884	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
95	Minh Tran 356 Montecito Way Milpitas, CA 95035	9/13/2023	282	Lordstown Motors Corp.	\$703.70	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.

96	Ms Donna R Taman 8814 Killians Greens Dr Las Vegas, NV 89131	9/11/2023	193	Lordstown Motors Corp.	\$41.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
97	Muhammad S. Chaudhry 400 Glendale Rd D/35 Havertown, PA 19083	9/22/2023	590	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
98	Nelson Debasa 5289 Ambleside Drive Concord, CA 94521	10/12/2023	1488	Lordstown Motors Corp.	\$5,500.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
99	Nicholas Lynn 101 Grace Crescent Barrie, ON L4N 0C3 Canada	9/20/2023	510	Lordstown Motors Corp.	\$13,331.96	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
100	Nicholaus Schilling 30504 SW 195th Ave Homestead, FL 33030	9/14/2023	315	Lordstown Motors Corp.	\$300.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
101	Olaf Robrecht #2307 969 Richards St Vancouver, BC V6B1A8 Canada	9/25/2023	650	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
102	Pamela Kritz 5038 Snapdragon Cr Little Suamico, WI 54141	10/5/2023	1016	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
103	Paramesu Badugu 63 A View Green Crescent Etobicoke, ON M9W7E1 Canada	9/19/2023	471	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.

104	Pauline Ottomanelli 3 Dante Drive Manchester, NJ 8759	10/4/2023	993	Lordstown Motors Corp.	\$4,710.35	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
105	Philip Andrew Samples 400 Sable Lane Statesboro, GA 30461	10/12/2023	1468	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
106	Praveenan Puvananayagan 619 Rue Toussaint Laval, QC H7X 4G1 Canada	9/18/2023	451	Lordstown Motors Corp.	\$12,000.00	Administrative	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
107	Quang Huynh 75 Harvest Oak Drive NE Calgary, AB T3K 4V2 Canada	9/28/2023	781	Lordstown Motors Corp.	\$81.90	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
108	Rachel Clark 5520 Wilson Dr Mentor, OH 44060	10/12/2023	1459	Lordstown Motors Corp.	\$145.20	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
109	Ralph Slotnick 2755 Aqua Verde Circle Los Angeles, CA 90077	9/18/2023	443	Lordstown Motors Corp.	\$484.64	Priority	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
110	Ray Ingrassia 10623 Aventura Drive Jacksonville, FL 32256	10/6/2023	1145	Lordstown Motors Corp.	\$6,187.05	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
111	Rex A Wyrick 1825 Bankfoot Ct Folsom, CA 95630	9/18/2023	413	Lordstown Motors Corp.	\$459.48	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.

112	Robert A. Minton 3760 Ewart Rd Mt Vernon, OH 43050	10/16/2023	1517	Lordstown Motors Corp.	\$16,000.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
113	Robert Carnevale 23 Ashwood Ave Whitesboro, NY 13492	9/19/2023	481	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
114	Robert R Coder Jr 44876 S.R 517 Columbiana, OH 44408	10/3/2023	951	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
115	Robert Radulski 115 Diogenes St Dunedin, FL 34698	9/19/2023	477	Lordstown Motors Corp.	\$664.96	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
116	Rodney J Carelock 2941 Winburn Dr Florence, SC 29501	10/10/2023	1442	Lordstown Motors Corp.	\$1,500.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
117	Rodolfo Oreste 107 Dean St. Mansfield, MA 2048	9/12/2023	246	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
118	Roman Shevchuk 2406 166th Ave SE Bellevue, WA 98008	10/5/2023	1069	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
119	Roy M. Jacobs 1691 Broadway Ave. East Canton, OH 44730	9/26/2023	706	Lordstown Motors Corp.	\$13,000.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.

120	Scott A. Davis 30 Carroll Ave Norwich, CT 6360	10/12/2023	1503	Lordstown Motors Corp.	\$1,750.06	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
121	Scott Hansen PO Box 1451 Albany, OR 97321	9/30/2023	818	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
122	Shane D Semb 618 Tall Pines Way Verona, WI 53593	9/25/2023	644	Lordstown Motors Corp.	\$19,631.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
123	Simon James Milde 39 North Haven Way Sag Harbor, NY 11963	9/18/2023	442	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
124	Solomon Wab Lumor 12 Andover Road Old Bridge, NJ 8857	9/14/2023	331	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
125	Stacy Waugh 2802 Cooper Ln Nashville, TN 37216	9/25/2023	641	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
126	Stanley Michaud 544 Greenwich Street Hempstead, NY 11550	9/11/2023	205	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
127	Stephen Fleming 31432 San Juan St Harrison Township, MI 48045-5901	10/4/2023	1003	Lordstown Motors Corp.	\$18,549.23	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.

128	Sumi Yi 2500 Stanford Dr Flower Mound, TX 75022	10/10/2023	1374	Lordstown Motors Corp.	\$76.22	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
129	Sumi Yi 2500 Stanford Dr Flower Mound, TX 75022	10/10/2023	1388	Lordstown Motors Corp.	\$22,479.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
130	Ta Kai Hsia 1107 Samstag Ct Naperville, IL 60563	10/2/2023	852	Lordstown Motors Corp.	\$10,151.41	Priority	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
131	Tam Q Trac 3809 Gayle St San Diego, CA 92115	9/25/2023	629	Lordstown Motors Corp.	\$2,801.73	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
132	Thanh Huynh 75 Harvest Oak Drive NE Calgary, AB T3K 4V2 Canada	9/18/2023	452	Lordstown Motors Corp.	\$108.31	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
133	Trent Sharp 8955 Upbeat Way Elk Grove, CA 95757	9/6/2023	97	Lordstown Motors Corp.	\$5,500.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
134	Tri Vinh Nguyen 104-98 Richmond Road Ottawa, ON K1Z 0B2 Canada	9/15/2023	342	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
135	Vincent & Pauline Ottomanelli 3 Dante Drive Manchester, NJ 8759	10/4/2023	992	Lordstown Motors Corp.	\$7,572.61	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.

136	Vincent Ottomanelli 3 Dante Drive Manchester, NJ 8759	10/4/2023	995	Lordstown Motors Corp.	\$2,805.00	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
137	Wen Hwai Horng 181 Nathan Hale Dr Deptford, NJ 8096	10/12/2023	1474	Lordstown Motors Corp.	\$821.03	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.
138	William Ortega 106-03 77th Street Ozone Park, NY 11417	9/27/2023	731	Lordstown Motors Corp.	Unknown	General Unsecured	Claimant did not provide sufficient documentation to constitute prima facie evidence of the validity and amount of the claim, and the Debtors' books and records do not reflect any claim on behalf of this claimant.

Schedule 3

Incorrect Debtor Claims

In re Lordstown Motors Corporation, et al.

Schedule 3: Incorrect Debtor Claims

#	Name of Claimant	Correct Debtor					Incorrect Debtor					Reason for Disallowance
		Date Claim Filed	Claim Number	Debtor Name	Claim Amount	Claim Type	Date Claim Filed	Claim Number	Debtor Name	Claim Amount	Claim Type	
1	Amazon Web Services, Inc. c/o KL Gates LLP 925 4th Avenue Suite 2900 Seattle, WA 98104	10/10/2023	1400	Lordstown Motors Corp.	\$10,124.89	General Unsecured	10/10/2023	1375	Lordstown EV Corporation	\$10,124.89	General Unsecured	Claim No. 1375 is a duplicate of Claim No. 1400 and the Debtors' books and records indicate this claim should be asserted against Lordstown Motors Corp.
2	Meta System S.p.A. 201 Nevada St Suite A El Segundo, CA 90245	10/10/2023	1432	Lordstown EV Corporation	\$480,994.43	General Unsecured	10/10/2023	1431	Lordstown Motors Corp.	\$480,994.43	General Unsecured	Claim No. 1431 is a duplicate of Claim No. 1432 and the Debtor's books and records indicate this claim should be asserted against Lordstown EV Corporation.
3	Superior Cam Inc. 31240 Stephenson Hwy Madison Heights, MI 48071	10/6/23	1158	Lordstown EV Corporation	\$551,394.30	General Unsecured	10/6/2023	1157	Lordstown Motors Corp.	\$551,394.30	General Unsecured	Claim No. 11571 is a duplicate of Claim No. 1158 and the Debtors' books and records indicate this claim should be asserted against Lordstown EV Corporation.
4	The Timken Company and The Timken Corporation Thompson Hine LLP 127 Public Sq Suite 3900 Cleveland, OH 44114	10/7/2023	1218	Lordstown EV Corporation	\$316,514.00	Secured	10/7/2023	1214	Lordstown Motors Corp.	\$316,514.00	Secured	Claim No. 1214 is a duplicate of Claim No. 1218 and the Debtors' books and records indicate this claim should be asserted against Lordstown EV Corporation.

Schedule 4

Late-Filed Claims

In re Lordstown Motors Corporation, *et al.*

Schedule 4: Late-Filed Claims

Late Claim to be Disallowed							
#	Name of Claimant	Date Claim Filed	Claim Number	Debtor Name	Claim Amount	Claim Type	Reason for Disallowance
1	Fiberdyne Research Pty Ltd 14 Carmel Avenue Ferntree Gully, VIC 3156 Australia	10/22/2023	1550	Lordstown EV Corporation	\$412,287.00	General Unsecured	Claim was failed after the General Bar Date of 10/10/2023.
2	Skynet Innovations 350 E Main Street, Suite 200 Batavia, OH 45103	10/31/2023	1562	Lordstown EV Corporation	\$38,323.67	General Unsecured	Claim was failed after the General Bar Date of 10/10/2023.

Exhibit B

Tsitsis Declaration

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

In re:

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**DECLARATION OF CONSTADINOS D. TSITSIS IN SUPPORT OF DEBTORS' FIRST
OMNIBUS (NON-SUBSTANTIVE) OBJECTION TO CERTAIN
(I) DUPLICATE CLAIMS, (II) INSUFFICIENT DOCUMENTATION CLAIMS,
(III) INCORRECT DEBTOR CLAIMS AND (IV) LATE-FILED CLAIMS**

I, Constadinos D. Tsitsis, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a partner and managing director at Silverman Consulting (“**Silverman**”). On July 25, 2023, the Court approved Silverman’s retention as restructuring advisor to Lordstown Motors Corp. and its debtor affiliates in the above-captioned chapter 11 cases (collectively, the “**Debtors**”) *nunc pro tunc* to June 27, 2023.

2. I submit this declaration (the “**Declaration**”) in support of the *Debtors’ First Omnibus (Non-Substantive) Objection to Certain (i) Duplicate Claims, (ii) Insufficient Documentation Claims, (iii) Incorrect Debtor Claims, and (iv) Late-Filed Claims* (the “**Objection**”),² dated as of the date hereof and filed contemporaneously herewith.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Objection.

3. I am over the age of eighteen and am authorized by the Debtors to submit this Declaration. Except as otherwise indicated, all statements in this Declaration are based upon my personal knowledge, my review (or the review of others under my supervision) of (a) the relevant proofs of claim and (b) the official register of claims filed in the Chapter 11 Cases. If called as a witness, I could and would competently testify to the facts set forth in this Declaration.

4. The proofs of claim subject to the Objection were carefully reviewed and analyzed in good faith using due diligence by appropriate personnel of the Debtors, Silverman, KCC, White & Case LLP, and Womble Bond Dickinson (US) LLP. These efforts resulted in identifying the Disputed Claims set forth in Schedules 1-4 to Exhibit A to the Objection.

DUPLICATE CLAIMS

5. My team and I, along with the Debtors or the Debtors' other advisors, have reviewed the Duplicate Claims listed on **Schedule 1** to the Proposed Order. In evaluating the Duplicate Claims and the corresponding Surviving Claims, the Debtors and my team and I have determined that each Duplicate Claim was filed by or on behalf of the same claimant, in the same amount and priority, on account of the same alleged liability, and against the same Debtor³ more than once. Each claim listed under the column "Duplicate Claim to be Disallowed" is duplicative of the corresponding claim listed under the column titled "Surviving Claim."

6. Certain of these Duplicate Claims are identical to the corresponding Surviving Claim. Specifically, the Duplicate Claims listed under the column "Duplicate Claim to be Disallowed" in Rows 1, 3-4 are identical in all respects to the corresponding Surviving Claim.

³ In certain instances, a claimant may not have identified a Debtor entity against which a claim was asserted. Pursuant to paragraph 11(c) of the Bar Date Order, claims that do not identify any Debtor are deemed asserted and filed against Lordstown Motors Corp.

7. In other instances, certain Duplicate Claims assert the same alleged liability, in the same amount and priority, against the same Debtor, but differ immaterially from the corresponding Surviving Claim. Specifically, the Duplicate Claims listed under the column “Duplicate Claim to be Disallowed” in Rows 2 assert the same alleged liability, in the same amount and priority, against the same Debtor as the corresponding Surviving Claims but may differ in certain immaterial, non-substantive respects.

8. For the Duplicate Claims in Rows 1-4, the alleged liability, amount, priority, and Debtor against which such claim was asserted are identical, and the Surviving Claims include the same supporting documentation attached to the Duplicate Claim to be disallowed. However, these Surviving Claims also included additional documentation providing more detail in support of such Surviving Claim. None of the claimants asserting such claims identified the applicable Surviving Claim(s) as amending the related Duplicate Claim. Accordingly, the Debtors and my team and I did not assume that the applicable claimant intended that the Surviving Claims amend and supersede the corresponding Duplicate Claim.

9. The Debtors’ professionals performed an in-depth review of the proofs of claim and the Claims Register to determine whether such Duplicate Claims were in fact filed by, or on behalf of, the same claimant and on account of the same liability as the corresponding Surviving Claims. This review included ensuring that the Surviving Claims include those that attached the most fulsome documentation. Therefore, after careful review, it is my belief that all of the Duplicate Claims listed under the column “Duplicate Claim to be Disallowed” are in fact duplicates of the corresponding Surviving Claims.

INSUFFICIENT DOCUMENTATION CLAIMS

10. My team and I, along with the Debtors or the Debtors' other advisors, have reviewed the Insufficient Documentation Claims listed on **Schedule 2** to the Proposed Order. Based on our review, each Insufficient Documentation Claim listed on **Schedule 2** to the Proposed Order was filed without sufficient documentation to substantiate the claims asserted therein. The Debtors have been unable to locate any documentation that would substantiate the Insufficient Documentation Claims, whether in full or in part.

11. The basis for the Debtors' determination includes, but is not limited to, the Debtors' and their professionals' review of (a) the Debtors' books and records, which are maintained in the ordinary course of business by the Debtors, which do not reflect the existence of the asserted Insufficient Documentation Claims and (b) the proofs of claims asserting the Insufficient Documentation Claims, which provide no basis or appropriate supporting documentation on which the Debtors can determine that a valid claim exists. Therefore, the Debtors object to the allowance of the Insufficient Documentation Claims set forth on **Schedule 2** to the Proposed Order and seek entry of the Proposed Order disallowing and expunging the Insufficient Documentation Claims in their entirety.

INCORRECT DEBTOR CLAIMS

12. My team and I, along with the Debtors or the Debtors' other advisors, have reviewed the Incorrect Debtor Claims listed on **Schedule 3** to the Proposed Order. In evaluating each of the Incorrect Debtor Claims identified on Schedule 3, the Debtors have thoroughly reviewed their Books and Records, the Claims Register, and the relevant proofs of claim, as well as the supporting documentation provided by the claimant (if any) and have determined that each Incorrect Debtor Claim should be disallowed, with the Correct Debtor Claims remain on the Claim Register, as set forth in the Objection.

13. Specifically, the Debtors determined that the Incorrect Debtor Claims identified on Schedule 4 to the Proposed Order are duplicate of other Claims and do not accurately reflect the Debtor entity that may be liable for the underlying claim for the specific reasons set forth on Schedule 3. The Debtors determined that each Incorrect Debtor Claim should be disallowed, and the Claims in the column labeled “Correct Debtor” (the “**Corrected Debtor Claims**”) on Schedule 3 to the Proposed Order should remain on the Claim Register. The Debtors believe that the claim identified under the Corrected Debtor Claims heading for each Incorrect Debtor Claim is consistent with the Debtors’ Books and Records.

14. I believe that the disallowance of the Incorrect Debtor Claims identified on Schedule 4 to the Proposed Order will enable the Debtors to maintain a more accurate claims register in these Chapter 11 Cases.

LATE-FILED CLAIMS

15. My team and I, along with the Debtors or the Debtors’ other advisors, have reviewed the Late-Filed Claims listed on **Schedule 4** to the Proposed Order and have determined that the Late-Filed Claims under the heading labeled “Late Claim to be Disallowed” were for claims that arose before the Petition Date, were subject to the General Bar Date, were filed after the General Bar Date, and were not specific amendments to any timely-filed claim. Accordingly, to prevent the claimants who failed to timely file their claims from receiving an unwarranted recovery to the detriment of the Debtors and creditors who complied with the Bar Date Order and timely filed proofs of claims in these Chapter 11 Cases, the Debtors seek entry of an order disallowing and expunging the Late-Filed Claims in their entirety.

16. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Date: November 10, 2023

/s/Constadinos D. Tsitsis

Constadinos D. Tsitsis

Partner at Silverman Consulting