

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)

**Re: Docket Nos. 651, 657, 766 941, 1014,
1016 & 1042**

**NOTICE OF FILING OF THIRD SUPPLEMENTAL PLAN
SUPPLEMENT FOR THE THIRD MODIFIED FIRST
AMENDED JOINT CHAPTER 11 PLAN OF LORDSTOWN
MOTORS CORP. AND ITS AFFILIATED DEBTORS**

PLEASE TAKE NOTICE that on November 1, 2023, the United States Bankruptcy Court for the District of Delaware (the “**Bankruptcy Court**”) entered an order [Docket No. 651] (the “**Disclosure Statement Order**”): (a) approving the *Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “**Disclosure Statement**”) and the form and manner of notice; (b) approving procedures for soliciting, receiving, and tabulating votes on the Plan and for filing objections to the Plan (the “**Solicitation Procedures**”); (c) approving the forms of ballots; (d) approving the form, manner and scope of confirmation notices; (e) establishing certain deadlines in connection with approval of the Disclosure Statement and confirmation of the Plan (defined below); and (f) granting related relief.

PLEASE TAKE FURTHER NOTICE that, on December 1, 2023, the Debtors filed *Notice of Filing of Plan Supplement for the Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 766] (the “**Original Plan Supplement**”).

PLEASE TAKE FURTHER NOTICE that, on January 31, 2024, the Debtors filed the *Second Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 941].

PLEASE TAKE FURTHER NOTICE that, on February 28, 2024, the Debtors filed the *Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated*

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.



Debtors [Docket No. 1014] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “**Plan**”).²

PLEASE TAKE FURTHER NOTICE that, the Debtors filed *Notice of Filing of First Supplemental Plan Supplement for the Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 1016] (the “**First Supplemental Plan Supplement**”).

PLEASE TAKE FURTHER NOTICE that, the Debtors filed *Notice of Filing of Second Supplemental Plan Supplement for the Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [Docket No. 1042] (the “**Second Supplemental Plan Supplement**”).

PLEASE TAKE FURTHER NOTICE that, by this notice (the “**Third Supplemental Plan Supplement**,” and together with the Original Plan Supplement and the First Supplemental Plan Supplement, and the Second Supplemental Plan Supplement, the “**Plan Supplement**”) the Debtors hereby file a revised Schedule of Contracts Rejected Pursuant to Plan (attached as **Exhibit I-1**), along with a blackline to the draft included in the First Supplemental Plan Supplement (attached as **Exhibit I-2**). A chart of the complete Plan Supplement is as follows:

Exhibit	Document³	Reference
A	New Organizational Documents	Docket No. 1016, Ex. A-1
B	Identities of members of the New Board and Officers of Post-Effective Date Debtors	Docket No. 766, Ex. B
C	Schedule of Retained Causes of Action	Docket No. 1042, Ex. C
D	Post-Effective Date Debtor Amount	Docket No. 766, Ex. D
E	GUC Reserve	Docket No. 1016, Ex. E
F	Identity of Claims Ombudsman and Rates	Docket No. 1042, Ex. F
G	Identity of Litigation Trustee	Docket No. 1016, Ex. G
H	Litigation Trust Agreement	Docket No. 1042, Ex. H
I-1	Schedule of Contracts Rejected Pursuant to Plan	Attached hereto as <u>Exhibit I-1</u>
I-2	Blackline of Schedule of Contracts Rejected Pursuant to Plan	Attached hereto as <u>Exhibit I-2</u>
J	Asserted Claims Schedule	Docket No. 1016, Ex. J
K-1	Ohio Settlement Notice – Post-Card Notice	Docket No. 1016, Ex. K-1

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Plan or the Disclosure Statement, as applicable.

³ The exhibits set forth in the Plan Supplement remain subject to ongoing review and material revision in all respects.

Exhibit	Document ³	Reference
K-2	Ohio Settlement Notice – Publication Notice	Docket No. 1016, Ex. K-2
K-3	Ohio Settlement Notice – Longform Notice ⁴	Docket No. 1042, Ex. K-3
K-4	Ohio Settlement Notice – Proof of Claim Form	Docket No. 1042, Ex. K-4

PLEASE TAKE FURTHER NOTICE that the documents, schedules, and other information contained in this Plan Supplement (in each case, as may be amended, modified, or supplemented) are integral to and part of the Plan. These documents have not yet been approved by the Bankruptcy Court. If the Plan is approved, the documents contained in the Plan Supplement will be approved by the Bankruptcy Court pursuant to the Confirmation Order.

PLEASE TAKE FURTHER NOTICE that the Debtors reserve all rights to amend, modify, or supplement the Plan Supplement, and any of the documents contained therein, in accordance with the terms of the Plan. If material amendments or modifications are made to any of these documents, the Debtors will file a blackline with the Bankruptcy Court prior to the Confirmation Hearing marked to reflect the same.

PLEASE TAKE FURTHER NOTICE THAT a hearing to consider confirmation of the Plan (the “**Confirmation Hearing**”) has been scheduled for **March 5, 2024 at 3:00 p.m. (prevailing Eastern Time)**, before the Honorable Mary F. Walrath, United States Bankruptcy Judge, at the Bankruptcy Court, located at 824 North Market Street, Fifth Floor, Courtroom No. 4, Wilmington, Delaware 19801. **The Confirmation Hearing may be adjourned or continued from time to time by the Bankruptcy Court or the Debtors without further notice other than adjournments announced in open court or as indicated in any notice of agenda of matters scheduled for hearing filed by the Debtors with the Bankruptcy Court.**

PLEASE TAKE FURTHER NOTICE THAT you may obtain the Plan, the Disclosure Statement, the Plan Supplement, or related documents from Kurtzman Carson Consultants LLC (the “**Solicitation Agent**”) free of charge by: (a) calling the Debtors’ toll-free restructuring hotline at (877) 709-4757 (U.S./Canada) or (424) 236-7235 (international); (b) visiting the Debtors’ restructuring website at <https://www.kccellc.net/lordstown>; (c) writing to Lordstown Processing Center, c/o Kurtzman Carson Consultants LLC, 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245; or (d) emailing lordstowninfo@kccellc.com (with ‘Lordstown’ in the subject line).

You may also access from these materials for a fee via PACER at <http://www.deb.uscourts.gov/>.

⁴ The longform Ohio Settlement Notice was drafted by Ohio Class Counsel for their distribution to the Ohio Litigation Settlement Class Members. It does not reflect the views of any other party (including the Debtors, the Post-Effective Date Debtors, the UCC, or the EC) on the matters or construal of facts contained therein. By including the longform notice in this Plan Supplement and seeking approval of the same in connection with confirmation of the Plan, such other parties make no admission or concession and reserve all rights.

YOU ARE ADVISED TO CAREFULLY REVIEW AND CONSIDER THE PLAN, INCLUDING THE DISCHARGE, INJUNCTION, RELEASE, AND EXCULPATION PROVISIONS CONTAINED IN ARTICLE VIII OF THE PLAN. ARTICLE VIII.D OF THE PLAN CONTAINS THIRD-PARTY RELEASES. THUS, YOU ARE ADVISED TO REVIEW AND CONSIDER THE PLAN CAREFULLY BECAUSE YOUR RIGHTS MIGHT BE AFFECTED THEREUNDER.

THIS NOTICE IS BEING SENT TO YOU FOR INFORMATIONAL PURPOSES ONLY. IF YOU HAVE QUESTIONS WITH RESPECT TO YOUR RIGHTS UNDER THE PLAN OR ABOUT ANYTHING STATED HEREIN OR IF YOU WOULD LIKE TO OBTAIN ADDITIONAL INFORMATION, PLEASE CONTACT THE SOLICITATION AGENT AS SPECIFIED ABOVE. PLEASE NOTE THAT THE SOLICITATION AGENT MAY NOT PROVIDE LEGAL ADVICE. IF YOU NEED LEGAL ADVICE, PLEASE CONSULT WITH YOUR ATTORNEY.

Dated: March 4, 2024
Respectfully submitted,

/s/Morgan L. Patterson
**WOMBLE BOND DICKINSON (US)
LLP**

Donald J. Detweiler (Bar No. 3087)
Morgan L. Patterson (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

*Counsel to Debtors and Debtors-in-
Possession*

WHITE & CASE LLP

Thomas E Lauria (admitted *pro hac vice*)
Matthew C. Brown (admitted *pro hac vice*)
Fan B. He (admitted *pro hac vice*)
200 South Biscayne Boulevard, Suite 4900
Miami, FL 33131
Telephone: (305) 371-2700
tlauria@whitecase.com
mbrown@whitecase.com
fhe@whitecase.com

David M. Turetsky (admitted *pro hac vice*)
1221 Avenue of the Americas
New York, NY 10020
Telephone: (212) 819-8200
david.turetsky@whitecase.com

Jason N. Zakia (admitted *pro hac vice*)
111 South Wacker Drive, Suite 5100
Chicago, IL 60606
Telephone: (312) 881-5400
jzakia@whitecase.com

Roberto Kampfner (admitted *pro hac vice*)
Doah Kim (admitted *pro hac vice*)
RJ Szuba (admitted *pro hac vice*)
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

Counsel to Debtors and Debtors-in-Possession

Exhibit I-1

Schedule of Contracts Rejected Pursuant to Plan

Schedule of Rejected Contracts

	Counterparty or Landlord	Counterparty of Landlord Address and/or Email Address	Contract Description	Debtor	Rejection Effective Date
1	Adam Kroll	1223 Fairfield Rd. Glencoe, IL 60022	Employment Agreement	Lordstown Motors Corp.	Effective Date of Plan
2	Alliance Advisors, LLC	200 Broadacres Drive, 3rd Floor Bloomfield, NJ 07003	Master Services Agreement	Lordstown Motors Corp.	Effective Date of Plan
3	Andrew W. Reyntjes	25535 Wareham Drive Huntington Woods, MI 48070	Employment Agreement	Lordstown Motors Corp.	Effective Date of Plan
4	Ankura Consulting, LLC	425 California Street, Suite 2600 San Francisco, CA 94104	Engagement Letter	Lordstown Motors Corp.	Effective Date of Plan
5	ANSYS, Inc.	2600 ANSYS Drive Canonsburg, PA 15317	Purchase Order 118107 (LSTC LS-DYNA Large System Core - Lease)	Lordstown Motors Corp.	Effective Date of Plan
6	ANSYS, Inc.	2600 ANSYS Drive Canonsburg, PA 15317	Quotation (LSTC LS-DYNA Large System Core - Lease)	Lordstown Motors Corp.	Effective Date of Plan
7	ANSYS, Inc.	2600 ANSYS Drive Canonsburg, PA 15317	Software License Agreement	Lordstown Motors Corp.	Effective Date of Plan
8	AP Expert Group	228 Park Ave S Suite 88617 New York, NY 88617	Expert Services Agreement	Lordstown Motors Corp.	Effective Date of Plan
9	Arthur J. Gallagher Risk Management Services, Inc.	2200 Woodcrest Pl. Ste. 250 Birmingham, AL 35209-1324	Client Services Agreement	Lordstown Motors Corp.	Effective Date of Plan
10	AT&T Mobility LLC	2180 Lenox Park Blvd., 10th Floor Atlanta, GA 30319	Test Sim Agreement	Lordstown Motors Corp.	Effective Date of Plan
11	AuditBoard, Inc.	12900 Park Plaza Dr., Suite 200 Cerritos, CA 90703	Order From	Lordstown Motors Corp.	Effective Date of Plan
12	Baker & Hostetler LLP	Key Tower 127 Public Square, Suite 2000 Cleveland, OH 44114-1214	Letter re: Confirmation of Engagement as Counsel	Lordstown EV Corporation	Effective Date of Plan
13	Baker & Hostetler LLP	Key Tower 127 Public Square, Suite 2000 Cleveland, OH 44114-1214	Letter re: Confirmation of Engagement as Counsel	Lordstown Motors Corp.	Effective Date of Plan
14	Baker Hostetler	127 Public Sq., Ste. 2000 Cleveland, OH 44114	Statement of Work	Lordstown EV Corporation	Effective Date of Plan
15	Bodman PLC	6th Floor at Ford Field 1901 St. Antoine Street Detroit, MI 48226	Letter re: Engagement of Bodman PLC	Lordstown Motors Corp.	Effective Date of Plan
16	Cigna Health And Life Insurance Company	900 Cottage Grove Road Bloomfield, CT 06002	OAP Base Plan, OAP Enhanced Plan, HDHP Plan, Dental Base Plan & Dental Buy Up Plan Insurance Policies (00631629)	Lordstown EV Corporation	Effective Date of Plan
17	Cintas Corporation No.2 - Payer#18650915	P.O BOX 630910 Cincinnati, OH 45262	Purchase order 118742 dated July 31, 2023	Lordstown EV Corporation	Effective Date of Plan
18	Comcast Business	1701 John F Kennedy Blvd Philadelphia, PA 19103-2838	Comcast Enterprise Services Sales Order Form	Lordstown Motors Corp.	Effective Date of Plan
19	Comcast Cable Communications Management, LLC	1701 John F Kennedy Blvd Philadelphia, PA 19103-2838	Comcast Business Service Order	Lordstown Motors Corp.	Effective Date of Plan
20	Corporate Dining, Inc	1645 W Hamlin Rochester Hills, MI 48309	Purchase order 118447 dated May 3, 2023	Lordstown EV Corporation	Effective Date of Plan
21	Cox Communications California, LLC., Cox California Telecom, LLC	27121 Towne Centre Dr Foothill Ranch, CA 92610	Purchase order 118771 dated July 23, 2023	Lordstown EV Corporation	Effective Date of Plan
22	Custodial Building Services, Inc	30200 Telegraph #158 Bingham Farms, MI 48025	Purchase order 118440 dated May 30, 2023	Lordstown EV Corporation	Effective Date of Plan
23	Custodial Building Services, Inc	30200 Telegraph #158 Bingham Farms, MI 48025	Purchase order 118848 dated May 30, 2023	Lordstown EV Corporation	Effective Date of Plan
24	Daniel Ninivaggi	3575 Roland Drive Bloomfield Hills, MI 48301	Amended and Restated Employment Agreement	Lordstown Motors Corp.	Effective Date of Plan

	Counterparty or Landlord	Counterparty of Landlord Address and/or Email Address	Contract Description	Debtor	Rejection Effective Date
25	Donna L. Bell	30444 Cascade Court Southfield, MI 48076	Employment Agreement	Lordstown Motors Corp.	Effective Date of Plan
26	Edward T. Hightower	23068 Kristy Lane Southfield, MI 48033	Amended and Restated Employment Agreement	Lordstown Motors Corp.	Effective Date of Plan
27	Elaphe Propulsion Technologies LTD.	Teslova Ulica 30 Ljubljana 1000 Slovenia	Facilities and Support Agreement	Lordstown EV Corporation	Effective Date of Plan
28	Foley & Lardner LLP	90 Park Ave New York, NY 10016-1314	Engagement Letter Agreement	Lordstown Motors Corp.	Effective Date of Plan
29	Foxconn EV System LLC	4568 Mayfield Road, Suite 204 Cleveland, OH 44121	Manufacturing Supply Agreement	Lordstown EV Corporation	Effective Date of Plan
30	Foxconn EV System LLC	4568 Mayfield Road, Suite 204 Cleveland, OH 44121	Purchase order 117863 dated June 16, 2023	Lordstown EV Corporation	Effective Date of Plan
31	Foxconn Ventures Pte. Ltd.	Attention: Jerry Hsiao No. 66, Zhongshan Road New Taipei City, 23680	Investment Agreement	Lordstown Motors Corp.	Effective Date of Plan
32	GAC R&D Center Detroit, LLC	38555 Hills Tech Drive Farmington Hills, MI 48331	Landlord's Consent to Sublease	Lordstown EV Corporation	Effective Date of Plan
33	GAC R&D Center Detroit, LLC	38555 Hills Tech Drive Farmington Hills, MI 48331	Sublease	Lordstown EV Corporation	Effective Date of Plan
34	GAC R&D Center Detroit, LLC	38555 Hills Tech Dr. Farmington Hills, MI 48331	GAC/LMC Lease Agreement modification addendum	Lordstown Motors Corp.	Effective Date of Plan
35	GAC R&D Center Detroit, LLC	38555 Hills Tech Drive Farmington Hills, MI 48331	Lease	Lordstown Motors Corp.	Effective Date of Plan
36	GitLab Inc.	268 Bush Street #350 San Francisco, CA 94104	Professional Services Agreement	Lordstown Motors Corp.	Effective Date of Plan
37	GitLab Inc.	268 Bush Street #350 San Francisco, CA 94104	Renewal Order Form	Lordstown Motors Corp.	Effective Date of Plan
38	GitLab Inc.	268 Bush Street #350 San Francisco, CA 94104	Subscription Agreement	Lordstown Motors Corp.	Effective Date of Plan
39	Greatech Intergration (M) Sdn. Bhd.	Plot 287 (A), Lengkok Kampung Jawa Satu Bayan Lepas Fiz Phase 3 11900 Penang, Malaysia	Airfreight Reimbursement Agreement	Lordstown EV Corporation	Effective Date of Plan
40	Greatech Intergration (M) Sdn. Bhd.	Plot 287 (A), Lengkok Kampung Jawa Satu Bayan Lepas Fiz Phase 3 11900 Penang, Malaysia	Purchase of Equipment	Lordstown EV Corporation	Effective Date of Plan
41	Haynes and Boone, LLP	6000 Headquarters Drive, Suite 200 Plano, TX 75024	Engagement Letter re: Legal Representation	Lordstown Motors Corp.	Effective Date of Plan
42	Hewlett-Packard Financial Services Company	200 Connell Drive Suite 5000 Berkeley Heights, NJ 07922	Business Lease Agreement (Lease Number: 5542969051222479USA1)	Lordstown EV Corporation	Effective Date of Plan
43	Hewlett-Packard Financial Services Company	200 Connell Drive Berkeley Heights, NJ 07922	Business Lease Agreement (Lease Number: 5542969051228412USA2)	Lordstown EV Corporation	Effective Date of Plan
44	Hewlett-Packard Financial Services Company	200 Connell Drive Suite 5000 Berkeley Heights, NJ 07922	Letter re: Business Lease Agreement	Lordstown EV Corporation	Effective Date of Plan
45	Infosys Limited	2400 N Glenville Dr, C150 Richardson, TX 75082	Purchase order 118888 dated July 13, 2023	Lordstown EV Corporation	Effective Date of Plan
46	Infosys Limited	2400 N Glenville Dr, C150 Richardson, TX 75082	Purchase order 118889 dated June 27, 2023	Lordstown EV Corporation	Effective Date of Plan
47	Infosys Limited	2400 N Glenville Dr, C150 Richardson, TX 75082	Letter of Engagement	Lordstown Motors Corp.	Effective Date of Plan
48	Jefferies LLC	520 Madison Ave. New York, NY 10022	Engagement Letter re: Transactions	Lordstown Motors Corp.	Effective Date of Plan
49	Jill Coniglio-Kirk	7130 Holiday Drive Bloomfield Hills, MI 48301	Employment Agreement	Lordstown Motors Corp.	Effective Date of Plan

	Counterparty or Landlord	Counterparty of Landlord Address and/or Email Address	Contract Description	Debtor	Rejection Effective Date
50	Joseph Kallabat & Associate, P.C.	7031 Orchard Lake Road Suite 302 West Bloomfield, MI 48322	Letter re: Confirmation of Representation	Lordstown Motors Corp.	Effective Date of Plan
51	Kekst and Company, Incorporated	437 Madison Avenue, 37th Floor New York, NY 10022	Engagement Letter re: Retained for Corporate Communications Counsel	Lordstown Motors Corp.	Effective Date of Plan
52	Luis Mayen dba Guarantee Details Cleaning dba G.D.C.	11 E. Normandy PL Santa Ana, CA 92701	Purchase order 118520 dated July 1, 2023	Lordstown EV Corporation	Effective Date of Plan
53	Lumma Clean LLC	48572 Carnegie Way Macomb, MI 48042	Purchase order 119137 dated July 3, 2023	Lordstown EV Corporation	Effective Date of Plan
54	Melissa Leonard	1649 Four Seasons Drive Akron, OH 44333	Employment Agreement	Lordstown Motors Corp.	Effective Date of Plan
55	Michael Port	37435 Bunker Hill Dr Solon, OH 44139	Employment Agreement, as amended	Lordstown Motors Corp.	Effective Date of Plan
56	Nelson Mullins Riley & Scarborough LLP	101 Constitution Ave, Suite 900 Washington, DC 20001	Letter re: Terms of Engagement	Lordstown Motors Corp.	Effective Date of Plan
57	Open Text Inc.	9711 Washingtonian Blvd., Suite 700 Gaithersburg, MD 20878	Purchase order 106170 dated May 23, 2023	Lordstown EV Corporation	Effective Date of Plan
58	Open Text Inc.	9711 Washingtonian Blvd., Suite 700 Gaithersburg, MD 20878	Purchase order 111548 dated May 31, 2023	Lordstown EV Corporation	Effective Date of Plan
59	Oracle America, Inc.	500 Oracle Parkway Redwood Shores, CA 94065	Oracle Ordering Document	Lordstown Motors Corp.	Effective Date of Plan
60	Potter Anderson & Corroon LLP	1313 North Market Street P.O. Box 951 Wilmington, DE 19899-0951	Engagement Letter Agreement	Lordstown Motors Corp.	Effective Date of Plan
61	Principal Life Insurance Company	711 High Street Des Moines, IA 50392	Group Long Term Disability Insurance (GLT 1119738)	Lordstown EV Corporation	Effective Date of Plan
62	Principal Life Insurance Company	711 High Street Des Moines, IA 50392	Group Member Life Insurance (GL 1119738)	Lordstown EV Corporation	Effective Date of Plan
63	Principal Life Insurance Company	711 High Street Des Moines, IA 50392	Group Short Term Disability Insurance (GST 1119738)	Lordstown EV Corporation	Effective Date of Plan
64	Principal Life Insurance Company	711 High Street Des Moines, IA 50392	Group Vision Care Expense Insurance (GVE 1119738)	Lordstown EV Corporation	Effective Date of Plan
65	Prospect Law LLP	120 N LaSalle St Suite 2000 Chicago, IL 60602	Letter re: Confirmation of Representation	Lordstown Motors Corp.	Effective Date of Plan
66	Richards Layton & Finger	920 N King Street Wilmington, DE 19801	Letter re: Engagement of Richards, Layton & Finger, P.A.	Lordstown Motors Corp.	Effective Date of Plan
67	Robar PR	1600 E. Grand Blvd., #300 Detroit, MI 48211	Public Relations Services Agreement	Lordstown Motors Corp.	Effective Date of Plan
68	RSM US LLP	30 South Wacker Drive Suite 3000 Chicago, IL 60606	Statement of Work Record-Report and Procedure-To-Pay Transformation	Lordstown Motors Corp.	Effective Date of Plan
69	Shopify Inc.	151 O'Connor Street, Ground Floor Ottawa, ON K2P 2L8	Terms of Service and Receipts	Lordstown Motors Corp.	Effective Date of Plan
70	Silverman Consulting	One North Wacker Drive, Suite 3925 Chicago, IL 60606	Letter re: Engagement	Lordstown EV Corporation	Effective Date of Plan
71	Sonitrol Orange County, LLC	23 Mauchly #100 Irvine, CA 92618	Purchase order 119008 dated August 1, 2023	Lordstown EV Corporation	Effective Date of Plan
72	Staples, Inc dba Staples Contract & Commercial, LLC	500 Staples Drive Framingham, MA 01702	Purchase order 118244 dated January 1, 2023	Lordstown EV Corporation	Effective Date of Plan
73	Sullivan & Cromwell LLP	125 Broad Street New York, NY 10004-2498	Engagement Letter re: Terms of Engagement	Lordstown Motors Corp.	Effective Date of Plan
74	TAG Resources, LLC	6501 Deane Hill Dr Knoxville, TN 37919	Amendment(s) Cycle 3 Restatement and the Plan	Lordstown EV Corporation	Effective Date of Plan
75	TAG Resources, LLC	6501 Deane Hill Drive Knoxville, TN 37919	Guide to Restatement	Lordstown EV Corporation	Effective Date of Plan

	Counterparty or Landlord	Counterparty of Landlord Address and/or Email Address	Contract Description	Debtor	Rejection Effective Date
76	Tata Consulting Services Limited	Nirmal Building 9th Floor Nariman Point, 400021 India	Purchase order 118858 dated June 6, 2023	Lordstown EV Corporation	Effective Date of Plan
77	Tata Consulting Services Limited	Nirmal Building 9th Floor Nariman Point, 400021 India	Purchase order 118953 dated June 6, 2023	Lordstown EV Corporation	Effective Date of Plan
78	Waqar Hasim	10866 Linda Vista Dr. Cupertino, CA 95014	Relocation Offer Letter	Lordstown Motors Corp.	Effective Date of Plan
79	White & Case LLP	Southeast Financial Center 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131-2352	Engagement Letter re: Restructuring of the Company	Lordstown Motors Corp.	Effective Date of Plan
80	Willowgreen Building Group, LLC	260 E. Brown St. Ste. 280 Birmingham, MI 48009	Landlord's Consent to Sublease	Lordstown EV Corporation	Effective Date of Plan
81	Willowgreen Building Group, LLC	260 E. Brown Street, Suite 280 Birmingham, MI 48009	Lease	Lordstown EV Corporation	Effective Date of Plan
82	Winston & Strawn LLP	35 W. Wacker Dr Chicago, IL 60601	Engagement Letter	Lordstown Motors Corp.	Effective Date of Plan
83	WIT Legal, LLC	1370 Broadway 15th Floor New York, NY 10018	Expert Services Agreement	Lordstown Motors Corp.	Effective Date of Plan

Exhibit I-2

Blackline of Schedule of Contracts Rejected Pursuant to Plan

Schedule of Rejected Contracts

	Counterparty or Landlord	Counterparty of Landlord Address and/or Email Address	Contract Description	Debtor	Rejection Effective Date
1	Adam Kroll	1223 Fairfield Rd. Glencoe, IL 60022	Employment Agreement	Lordstown Motors Corp.	Effective Date of Plan
2	Alliance Advisors, LLC	200 Broadacres Drive, 3rd Floor Bloomfield, NJ 07003	Master Services Agreement	Lordstown Motors Corp.	Effective Date of Plan
3	Andrew W. Reyntjes	25535 Wareham Drive Huntington Woods, MI 48070	Employment Agreement	Lordstown Motors Corp.	Effective Date of Plan
4	Ankura Consulting, LLC	425 California Street, Suite 2600 San Francisco, CA 94104	Engagement Letter	Lordstown Motors Corp.	Effective Date of Plan
5	ANSYS, Inc.	2600 ANSYS Drive Canonsburg, PA 15317	Purchase Order 118107 (LSTC LS-DYNA Large System Core - Lease)	Lordstown Motors Corp.	Effective Date of Plan
6	ANSYS, Inc.	2600 ANSYS Drive Canonsburg, PA 15317	Quotation (LSTC LS-DYNA Large System Core - Lease)	Lordstown Motors Corp.	Effective Date of Plan
7	ANSYS, Inc.	2600 ANSYS Drive Canonsburg, PA 15317	Software License Agreement	Lordstown Motors Corp.	Effective Date of Plan
8	AP Expert Group	228 Park Ave S Suite 88617 New York, NY 88617	Expert Services Agreement	Lordstown Motors Corp.	Effective Date of Plan
9	Arthur J. Gallagher Risk Management Services, Inc.	2200 Woodcrest Pl. Ste. 250 Birmingham, AL 35209-1324	Client Services Agreement	Lordstown Motors Corp.	Effective Date of Plan
10	AT&T Mobility LLC	2180 Lenox Park Blvd., 10th Floor Atlanta, GA 30319	Test Sim Agreement	Lordstown Motors Corp.	Effective Date of Plan
11	AuditBoard, Inc.	12900 Park Plaza Dr., Suite 200 Cerritos, CA 90703	Order From	Lordstown Motors Corp.	Effective Date of Plan
12	Baker & Hostetler LLP	Key Tower 127 Public Square, Suite 2000 Cleveland, OH 44114-1214	Letter re: Confirmation of Engagement as Counsel	Lordstown EV Corporation	Effective Date of Plan
13	Baker & Hostetler LLP	Key Tower 127 Public Square, Suite 2000 Cleveland, OH 44114-1214	Letter re: Confirmation of Engagement as Counsel	Lordstown Motors Corp.	Effective Date of Plan
14	Baker Hostetler	127 Public Sq., Ste. 2000 Cleveland, OH 44114	Statement of Work	Lordstown EV Corporation	Effective Date of Plan
15	Bodman PLC	6th Floor at Ford Field 1901 St. Antoine Street Detroit, MI 48226	Letter re: Engagement of Bodman PLC	Lordstown Motors Corp.	Effective Date of Plan
16	Cigna Health And Life Insurance Company	900 Cottage Grove Road Bloomfield, CT 06002	04/1 Base Plan, 04/1 Enhanced Plan, 11/20/11 Plan, Dental Base Plan & Dental Buy Up Plan Insurance Policies (00621620)	Lordstown EV Corporation	Effective Date of Plan
17	Cintas Corporation No.2 - Payer#18650915	P.O BOX 630910 Cincinnati, OH 45262	Purchase order 118742 dated July 31, 2023	Lordstown EV Corporation	Effective Date of Plan
18	Comcast Business	1701 John F Kennedy Blvd Philadelphia, PA 19103-2838	Comcast Enterprise Services Sales Order Form	Lordstown Motors Corp.	Effective Date of Plan
19	Comcast Cable Communications Management, LLC	1701 John F Kennedy Blvd Philadelphia, PA 19103-2838	Comcast Business Service Order	Lordstown Motors Corp.	Effective Date of Plan
20	Corporate Dining, Inc	1645 W Hamlin Rochester Hills, MI 48309	Purchase order 118447 dated May 3, 2023	Lordstown EV Corporation	Effective Date of Plan
21	Cox Communications California, LLC., Cox California Telcom, LLC	27121 Towne Centre Dr Foothill Ranch, CA 92610	Purchase order 118771 dated July 23, 2023	Lordstown EV Corporation	Effective Date of Plan
22	Custodial Building Services, Inc	30200 Telegraph #158 Bingham Farms, MI 48025	Purchase order 118440 dated May 30, 2023	Lordstown EV Corporation	Effective Date of Plan
23	Custodial Building Services, Inc	30200 Telegraph #158 Bingham Farms, MI 48025	Purchase order 118848 dated May 30, 2023	Lordstown EV Corporation	Effective Date of Plan
24	Daniel Ninivaggi	3575 Roland Drive Bloomfield Hills, MI 48301	Amended and Restated Employment Agreement	Lordstown Motors Corp.	Effective Date of Plan

	Counterparty or Landlord	Counterparty of Landlord Address and/or Email Address	Contract Description	Debtor	Rejection Effective Date
25	Donna L. Bell	30444 Cascade Court Southfield, MI 48076	Employment Agreement	Lordstown Motors Corp.	Effective Date of Plan
26	Edward T. Hightower	23068 Kristy Lane Southfield, MI 48033	Amended and Restated Employment Agreement	Lordstown Motors Corp.	Effective Date of Plan
27	Elaphe Propulsion Technologies LTD.	Teslova Ulica 30 Ljubljana 1000 Slovenia	Facilities and Support Agreement	Lordstown EV Corporation	Effective Date of Plan
28	Foley & Lardner LLP	90 Park Ave New York, NY 10016-1314	Engagement Letter Agreement	Lordstown Motors Corp.	Effective Date of Plan
29	Foxconn EV System LLC	4568 Mayfield Road, Suite 204 Cleveland, OH 44121	Manufacturing Supply Agreement	Lordstown EV Corporation	Effective Date of Plan
30	Foxconn EV System LLC	4568 Mayfield Road, Suite 204 Cleveland, OH 44121	Purchase order 117863 dated June 16, 2023	Lordstown EV Corporation	Effective Date of Plan
31	Foxconn Ventures Pte. Ltd.	Attention: Jerry Hsiao No. 66, Zhongshan Road New Taipei City, 23680	Investment Agreement	Lordstown Motors Corp.	Effective Date of Plan
32	GAC R&D Center Detroit, LLC	38555 Hills Tech Drive Farmington Hills, MI 48331	Landlord's Consent to Sublease	Lordstown EV Corporation	Effective Date of Plan
33	GAC R&D Center Detroit, LLC	38555 Hills Tech Drive Farmington Hills, MI 48331	Sublease	Lordstown EV Corporation	Effective Date of Plan
34	GAC R&D Center Detroit, LLC	38555 Hills Tech Dr. Farmington Hills, MI 48331	GAC/LMC Lease Agreement modification addendum	Lordstown Motors Corp.	Effective Date of Plan
35	GAC R&D Center Detroit, LLC	38555 Hills Tech Drive Farmington Hills, MI 48331	Lease	Lordstown Motors Corp.	Effective Date of Plan
36	GitLab Inc.	268 Bush Street #350 San Francisco, CA 94104	Professional Services Agreement	Lordstown Motors Corp.	Effective Date of Plan
37	GitLab Inc.	268 Bush Street #350 San Francisco, CA 94104	Renewal Order Form	Lordstown Motors Corp.	Effective Date of Plan
38	GitLab Inc.	268 Bush Street #350 San Francisco, CA 94104	Subscription Agreement	Lordstown Motors Corp.	Effective Date of Plan
39	Greatech Intergration (M) Sdn. Bhd.	Plot 287 (A), Lengkok Kampung Jawa Satu Bayan Lepas Fiz Phase 3 11900 Penang, Malaysia	Airfreight Reimbursement Agreement	Lordstown EV Corporation	Effective Date of Plan
40	Greatech Intergration (M) Sdn. Bhd.	Plot 287 (A), Lengkok Kampung Jawa Satu Bayan Lepas Fiz Phase 3 11900 Penang, Malaysia	Purchase of Equipment	Lordstown EV Corporation	Effective Date of Plan
41	Haynes and Boone, LLP	6000 Headquarters Drive, Suite 200 Plano, TX 75024	Engagement Letter re: Legal Representation	Lordstown Motors Corp.	Effective Date of Plan
42	Hewlett-Packard Financial Services Company	200 Connell Drive Suite 5000 Berkeley Heights, NJ 07922	Business Lease Agreement (Lease Number: 5542969051222479USA1)	Lordstown EV Corporation	Effective Date of Plan
43	Hewlett-Packard Financial Services Company	200 Connell Drive Berkeley Heights, NJ 07922	Business Lease Agreement (Lease Number: 5542969051228412USA2)	Lordstown EV Corporation	Effective Date of Plan
44	Hewlett-Packard Financial Services Company	200 Connell Drive Suite 5000 Berkeley Heights, NJ 07922	Letter re: Business Lease Agreement	Lordstown EV Corporation	Effective Date of Plan
45	Infosys Limited	2400 N Glenville Dr, C150 Richardson, TX 75082	Purchase order 118888 dated July 13, 2023	Lordstown EV Corporation	Effective Date of Plan
46	Infosys Limited	2400 N Glenville Dr, C150 Richardson, TX 75082	Purchase order 118889 dated June 27, 2023	Lordstown EV Corporation	Effective Date of Plan
47	Infosys Limited	2400 N Glenville Dr, C150 Richardson, TX 75082	Letter of Engagement	Lordstown Motors Corp.	Effective Date of Plan
48	Jefferies LLC	520 Madison Ave. New York, NY 10022	Engagement Letter re: Transactions	Lordstown Motors Corp.	Effective Date of Plan

	Counterparty or Landlord	Counterparty of Landlord Address and/or Email Address	Contract Description	Debtor	Rejection Effective Date
49	Jill Coniglio-Kirk	7130 Holiday Drive Bloomfield Hills, MI 48301	Employment Agreement	Lordstown Motors Corp.	Effective Date of Plan
50	Joseph Kallabat & Associate, P.C.	7031 Orchard Lake Road Suite 302 West Bloomfield, MI 48322	Letter re: Confirmation of Representation	Lordstown Motors Corp.	Effective Date of Plan
51	Kekst and Company, Incorporated	437 Madison Avenue, 37th Floor New York, NY 10022	Engagement Letter re: Retained for Corporate Communications Counsel	Lordstown Motors Corp.	Effective Date of Plan
52	Luis Mayen dba Guarantee Details Cleaning dba G.D.C.	11 E. Normandy PL Santa Ana, CA 92701	Purchase order 118520 dated July 1, 2023	Lordstown EV Corporation	Effective Date of Plan
53	Lumma Clean LLC	48572 Carnegie Way Macomb, MI 48042	Purchase order 119137 dated July 3, 2023	Lordstown EV Corporation	Effective Date of Plan
54	Melissa Leonard	1649 Four Seasons Drive Akron, OH 44333	Employment Agreement	Lordstown Motors Corp.	Effective Date of Plan
55	Michael Port	37435 Bunker Hill Dr Solon, OH 44139	Employment Agreement, as amended	Lordstown Motors Corp.	Effective Date of Plan
56	Nelson Mullins Riley & Scarborough LLP	101 Constitution Ave, Suite 900 Washington, DC 20001	Letter re: Terms of Engagement	Lordstown Motors Corp.	Effective Date of Plan
57	Open Text Inc.	9711 Washingtonian Blvd., Suite 700 Gaithersburg, MD 20878	Purchase order 106170 dated May 23, 2023	Lordstown EV Corporation	Effective Date of Plan
58	Open Text Inc.	9711 Washingtonian Blvd., Suite 700 Gaithersburg, MD 20878	Purchase order 111548 dated May 31, 2023	Lordstown EV Corporation	Effective Date of Plan
59	Oracle America, Inc.	500 Oracle Parkway Redwood Shores, CA 94065	Oracle Ordering Document	Lordstown Motors Corp.	Effective Date of Plan
60	Paylocity Corporation	1400 American Lane Schaumburg, IL 60173	Paylocity Corporation Full Bundle Subscription Term Agreement	Lordstown EV Corporation	Effective Date of Plan
61	Paylocity Corporation	1400 American Lane Schaumburg, IL 60173	Paylocity Corporation Full Bundle Subscription Term Agreement	Lordstown EV Sales LLC	Effective Date of Plan
62/60	Potter Anderson & Corroon LLP	1313 North Market Street P.O. Box 951 Wilmington, DE 19899-0951	Engagement Letter Agreement	Lordstown Motors Corp.	Effective Date of Plan
63/61	Principal Life Insurance Company	711 High Street Metairie, LA 70002	Group Long Term Disability Insurance (GLT 1119738)	Lordstown EV Corporation	Effective Date of Plan
64/62	Principal Life Insurance Company	711 High Street Metairie, LA 70002	Group Member Life Insurance (GL 1119738)	Lordstown EV Corporation	Effective Date of Plan
65/63	Principal Life Insurance Company	711 High Street Metairie, LA 70002	Group Short Term Disability Insurance (GST 1119738)	Lordstown EV Corporation	Effective Date of Plan
66/64	Principal Life Insurance Company	711 High Street Metairie, LA 70002	Group Vision Care Expense Insurance (GVE 1119738)	Lordstown EV Corporation	Effective Date of Plan
67/65	Prospect Law LLP	120 N LaSalle St Suite 2000 Chicago, IL 60602	Letter re: Confirmation of Representation	Lordstown Motors Corp.	Effective Date of Plan
68/66	Richards Layton & Finger	920 N King Street Wilmington, DE 19801	Letter re: Engagement of Richards, Layton & Finger, P.A.	Lordstown Motors Corp.	Effective Date of Plan
69/67	Robar PR	1600 E. Grand Blvd., #300 Detroit, MI 48211	Public Relations Services Agreement	Lordstown Motors Corp.	Effective Date of Plan
70/68	RSM US LLP	30 South Wacker Drive Suite 3000 Chicago, IL 60606	Statement of Work Record-Report and Procedure-To-Pay Transformation	Lordstown Motors Corp.	Effective Date of Plan
71/69	Shopify Inc.	151 O'Connor Street, Ground Floor Ottawa, ON K2P 2L8	Terms of Service and Receipts	Lordstown Motors Corp.	Effective Date of Plan
72/70	Silverman Consulting	One North Wacker Drive, Suite 3925 Chicago, IL 60606	Letter re: Engagement	Lordstown EV Corporation	Effective Date of Plan
73/71	Sonitrol Orange County, LLC	25 Madison #100 Orange, CA 92668	Purchase order 119008 dated August 1, 2023	Lordstown EV Corporation	Effective Date of Plan
74/72	Staples, Inc dba Staples Contract & Commercial, LLC	500 Staples Drive Framingham, MA 01702	Purchase order 118244 dated January 1, 2023	Lordstown EV Corporation	Effective Date of Plan
75/73	Sullivan & Cromwell LLP	125 Broad Street New York, NY 10004-2498	Engagement Letter re: Terms of Engagement	Lordstown Motors Corp.	Effective Date of Plan
76/74	TAG Resources, LLC	6501 Deane Hill Dr Knoxville, TN 37919	Amendment(s) Cycle 3 Restatement and the Plan	Lordstown EV Corporation	Effective Date of Plan
77/75	TAG Resources, LLC	6501 Deane Hill Drive Knoxville, TN 37919	Guide to Restatement	Lordstown EV Corporation	Effective Date of Plan

	Counterparty or Landlord	Counterparty of Landlord Address and/or Email Address	Contract Description	Debtor	Rejection Effective Date
7876	Tata Consulting Services Limited	Nirmal Building 9th Floor Nariman Point, 400021 India	Purchase order 118858 dated June 6, 2023	Lordstown EV Corporation	Effective Date of Plan
7977	Tata Consulting Services Limited	Nirmal Building 9th Floor Nariman Point, 400021 India	Purchase order 118953 dated June 6, 2023	Lordstown EV Corporation	Effective Date of Plan
8078	Waqar Hasim	10866 Linda Vista Dr. Cupertino, CA 95014	Relocation Offer Letter	Lordstown Motors Corp.	Effective Date of Plan
8179	White & Case LLP	Southeast Financial Center 200 South Biscayne Boulevard, Suite 4900 Miami, FL 33131-2352	Engagement Letter re: Restructuring of the Company	Lordstown Motors Corp.	Effective Date of Plan
8280	Willowgreen Building Group, LLC	260 E. Brown St. Ste. 280 Birmingham, MI 48009	Landlord's Consent to Sublease	Lordstown EV Corporation	Effective Date of Plan
8381	Willowgreen Building Group, LLC	260 E. Brown Street, Suite 280 Birmingham, MI 48009	Lease	Lordstown EV Corporation	Effective Date of Plan
8482	Winston & Strawn LLP	25 W. Wacker Dr. Chicago, IL 60601	Engagement Letter	Lordstown Motors Corp.	Effective Date of Plan
8583	WIT Legal, LLC	1370 Broadway 15th Floor New York, NY 10018	Expert Services Agreement	Lordstown Motors Corp.	Effective Date of Plan