

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

NU RIDE INC., *et al.*,<sup>1</sup>

Reorganized Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Hearing Date: September 26, 2024 at 3:00 p.m. (ET)

Objection Deadline: September 12, 2024 at 4:00 p.m. (ET)

**POST-EFFECTIVE DATE DEBTORS' AND CLAIMS OMBUDSMAN'S  
JOINT FOURTH (NON-SUBSTANTIVE) OMNIBUS OBJECTION TO CLAIMS  
(Insufficient Documentation, No Liability)**

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN CLAIMS. CLAIMANTS RECEIVING THIS OBJECTION SHOULD REVIEW THIS OBJECTION AND LOCATE THEIR NAMES AND CLAIMS ON SCHEDULES 1-2 ATTACHED TO THIS OBJECTION 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 POST-EFFECTIVE DATE DEBTORS' AND CLAIMS OMBUDSMAN'S RIGHTS TO PURSUE FURTHER SUBSTANTIVE OR NON-SUBSTANTIVE OBJECTIONS AGAINST CERTAIN CLAIMS LISTED ON SCHEDULES 1-2 ATTACHED TO THIS OBJECTION.**

Nu Ride Inc. and its affiliated reorganized debtors in the above-captioned proceeding (the "Post-Effective Date Debtors") and Alan Halperin, solely in his capacity as Claims Ombudsman (the "Claims Ombudsman" and together with the Post-Effective Date Debtors, the "Movants"),<sup>2</sup> by and through their respective counsel, hereby jointly submit this fourth omnibus (non-substantive) objection (the "Objection"), pursuant to §§ 105(a) and 502 of title 11 of the United

<sup>1</sup> The Reorganized 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 Reorganized Debtors' service address is: Nu Ride Inc. c/o William Gallagher, CEO, M 3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

<sup>2</sup> Capitalized terms used in this Objection but not otherwise defined herein shall have the same meaning as in the *Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors* (the "Plan") [Dkt. No. 1066], unless the context otherwise requires.



States Code (the “Bankruptcy Code”), Rule 3007(d) 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”), seeking an order substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”): (1) disallowing and expunging in full the claims with insufficient supporting documentation that are identified on **Schedule 1** attached to the Proposed Order (the “Insufficient Documentation Claims”); and (2) disallowing and expunging in full the claims for which the Debtors (defined herein) have no liability that are identified on **Schedule 2** attached to the Proposed Order (the “No Liability Claims” and together with the Insufficient Documentation Claims, the “Disputed Claims”). In support of this Objection, the Movants submit the *Declaration of Alan D. Halperin Pursuant to 28 U.S.C. § 1746 and Local Rule 3007-1 in Support of the Post-Effective Date Debtors’ and Claims Ombudsman’s Joint Fourth (Non-Substantive) Omnibus Objection to Claims (Insufficient Documentation, No Liability)* (the “Halperin Declaration”) attached hereto as **Exhibit B**. In further support of this Objection, the Movants respectfully represent as follows:

**JURISDICTION AND VENUE**

1. This Court has jurisdiction to consider this matter pursuant to 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 pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The predicates for the relief requested by this Objection are section 502 of the Bankruptcy Code, Bankruptcy Rule 3007, and Local Rule 3007-1.

3. Pursuant to Local Rule 9013-1(f), the Movants 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**

4. On June 27, 2023 (the “Petition Date”), Lordstown Motors Corp. and its affiliated debtors (the “Debtors”) filed voluntary petitions in the United States Bankruptcy Court for the District of Delaware (the “Court”) commencing these cases (the “Chapter 11 Cases”), which are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b).

### **CLAIMS PROCESS**

5. On June 28, 2023, the Court entered an order authorizing the Debtors to retain and employ Kurtzman Carson Consultants LLC (now known as Verita Global) (“Verita”) as its claims and noticing agent [Dkt. No 54], and on July 25, 2023, the Court entered an order authorizing Verita to be the Debtors’ administrative advisor under 11 U.S.C. § 327(a) [Dkt. No. 174].

6. On August 1, 2023, the Debtors filed their schedules of assets and liabilities and statements of financial affairs [Dkt. No. 210-17], which were subsequently amended [Dkt. No. 377-385] on September 7, 2023 and may be further amended from time to time (collectively, as amended, supplemented, or further amended, the “Schedules”).

7. 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* [Dkt. No. 319] (the “Bar Date Order”).

8. 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) 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.

9. 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* [Dkt. No. 335] (the “Bar Date Notice”).

10. In accordance with the Bar Date Order, on August 31, 2023, Verita 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). Verita 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 [Dkt. No. 591] (the “Publication Notice”).

11. On March 6, 2024, the Court entered the *Order (I) Confirming Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors and (II) Granting Related Relief* (the “Confirmation Order”) [Dkt. No. 1069], confirming the Debtors’ Plan. As set forth in the *Notice of Effective Date and Entry of Order (I) Confirming the Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors and (II) Granting Related Relief* (the “Notice of Effective Date”) [Dkt. No. 1096], the Plan became effective on March 14, 2024 (the “Effective Date”).

12. The Plan established April 14, 2024 as the deadline by which requests for payment of Allowed Administrative Claims (except with respect to Administrative Claims that are Professional Fee Claims) must be filed (the “Administrative Claims Bar Date” and together with the General Bar Date, the Governmental Bar Date, the Rejection Bar Date, and the Amended Schedule Bar Date, the “Bar Dates”).

13. Pursuant to the Plan, the Debtors’ Chapter 11 Cases were substantively consolidated for the limited purpose of making Distributions. *Plan*, Art. V.A. As such, Claims asserted against multiple Debtors, including Claims based on joint and several liability and guarantee and/or surety Claims are deemed to constitute a single Claim against the consolidated Estate. *Id.*

14. Pursuant to the Confirmation Order and Plan, on the Effective Date, Alan D. Halperin was appointed Claims Ombudsman in these Chapter 11 Cases. *See* Confirmation Order, ¶ 68; Plan, Article V.D.1. As Ombudsman, Alan D. Halperin has the right, authority, and responsibility to object to, seek to subordinate, compromise or settle any and all General

Unsecured Claims, including by filing and prosecuting objections to General Unsecured Claims, subject to the limitations set forth in the Plan. Confirmation Order, ¶ 69, Plan, Article V.D.2. Additionally, the Ombudsman has the right to assert any and all rights and defenses that the applicable Debtor had with respect to any General Unsecured Claim immediately before the Effective Date. *Id.* All rights not expressly delegated to the Claims Ombudsman under the Plan are expressly reserved to the Post-Effective Date Debtors. *Id.* The Post-Effective Date Debtors have asked the Claims Ombudsman to review and reconcile certain secured, administrative and priority claims that are the subject of this Objection.

15. The claims register for these Chapter 11 Cases (the “Claims Register”), prepared and maintained by Verita, shows that over 1,645 proofs of claim have been filed against the Debtors as of the filing of this Objection.

16. In the ordinary course of business, the Debtors maintained 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 Movants, 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 Movants have determined that the Disputed Claims should be disallowed for one or more reasons. Accordingly, the Movants file this Objection seeking the relief requested below.

**CLAIM OBJECTION RELIEF REQUESTED**

17. By this Objection, and for the reasons set forth more fully below, the Movants object to the Disputed Claims pursuant to §§ 105(a) and 502 of the Bankruptcy Code, Bankruptcy Rules 3007 and 9014, and Local Rule 3007-1.

18. When asserting a proof of claim against a bankruptcy 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); *Matter of Int'l Match Corp.*, 69 F.2d 73, 76 (2d Cir. 1934) (finding that a proof of claim should at least allege facts from which legal liability can be seen to exist). Where a claimant alleges sufficient facts to support its claim, its claim is afforded *prima facie* validity. *In re Allegheny Int'l, Inc.*, 954 F.2d at 173. A party wishing to dispute such a claim must produce evidence in sufficient force to negate the claim's *prima facie* validity. *Id.* In practice, the objecting party must produce evidence that would refute at least one of the allegations essential to the claim's legal sufficiency. *Id.* Once the 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.* The burden of persuasion is always on the claimant. *Id.*

a. Insufficient Documentation Claims

19. While Bankruptcy Rule 3001(f) provides that a proof of claim executed and filed in accordance with the rules of procedure (i.e., includes the facts and documents necessary to support the claim) constitutes *prima facie* evidence of the validity and amount of the claim, this Court has recognized the position that a proof of claim lacking the supporting documentation required by Bankruptcy Rule 3001 does not receive the presumption of *prima facie* validity; rather, the claimant maintains the burden of proving its claim by a preponderance of the evidence. *In re New Century TRS Holdings, Inc.*, 495 B.R. 625, 633, (Bankr. D. Del. 2013) (citing *In re Kincaid*, 388 B.R. 610, 614 (Bankr. E.D. Pa. 2008)); Fed. R. Bankr. P. 3001(f).

20. The Insufficient Documentation Claims identified in **Schedule 1** should be disallowed and expunged in their entirety because they were filed without sufficient documentation to constitute *prima facie* evidence of the validity and amount of the claim asserted.

Indeed, the Insufficient Documentation Claims merely list an amount, without including any invoices, invoice information, statements, agreements, or other supporting documentation providing indicia of a debt owed by the Debtors. Furthermore, the Movants and their professionals have made reasonable efforts to research the Insufficient Document Claims on the Debtors' Books and Records and have identified no basis for the claims therein. Such Insufficient Documentation Claims are not *prima facie* valid and must be disallowed.

b. No Liability Claims

21. The Movants are objecting to the No Liability Claims listed on **Schedule 2** because the Movants believe that the Debtors have no liability for such claims, either because such claims have been satisfied, or because the Debtors' Books and Records show no amount due in tandem with such claims failing to include sufficient documentation to support the amount asserted. After reviewing each Claim, together with the Books and Records and consulting with certain of the Debtors' former principals, the Movants have determined that each No Liability Claim should be disallowed for the reasons set forth on **Schedule 2**.

**RESPONSES TO OBJECTION**

22. Filing and Service of Responses. To contest this Objection, a holder of a Disputed Claim must file and serve a written response to this 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 September 12, 2024 (the "Response Deadline"). Claimants should read the Proposed Order and Exhibits attached carefully.

23. Each Response must be filed and served upon the following entities at the following addresses: (i) counsel for the Post-Effective Date Debtors: (a) Brown Rudnick LLP, One Financial Center, Boston, MA 02111 (Attn: Sharon I. Dvoskin ([sdvoskin@brownrudnick.com](mailto:sdvoskin@brownrudnick.com))); and (b)



Morris James LLP, 500 Delaware Avenue, Suite 1500, Wilmington, DE 19801 (Attn: Eric J. Monzo ([emonzo@morrisjames.com](mailto:emonzo@morrisjames.com)) and Brya M. Keilson ([bkeilson@morrisjames.com](mailto:bkeilson@morrisjames.com)); and (ii) counsel for the Claims Ombudsman: (a) Halperin Battaglia & Benzija LLP, 40 Wall Street, New York, NY 10005 (Attn: Walter Benzija ([wbenzija@halperinlaw.net](mailto:wbenzija@halperinlaw.net)) and Keara Waldron ([kwaldron@halperinlaw.net](mailto:kwaldron@halperinlaw.net))), and (iv) (b) Bielli Klauder, LLC, 1204 N. King Street, Wilmington, DE 19801 (Attn: David M. Klauder ([dklauder@bk-legal.com](mailto:dklauder@bk-legal.com))).

24. Content of Responses. Every Response to this Objection must contain, at a minimum, the following:

- (a) a caption setting forth the name of the Court, the name of the Debtor, the case number and the title of this Objection to which the Response is directed;
- (b) the name of the claimant and description of the basis for the amount of the Disputed Claim;
- (c) a concise statement setting forth the reasons why the relief in this Objection should not be granted, including, but not limited to, the specific factual and legal bases upon which the claimant relies in opposing this Objection;
- (d) all documentation or other evidence supporting the Disputed Claim not previously filed with the Bankruptcy Court or the Agent, upon which the claimant relies in opposing this Objection; and
- (e) the name, address, telephone number, email and fax number of the person(s) (which may be the claimant or a legal representative thereof) to whom counsel for the Movants should serve a reply, if any, to the Response and who possesses authority to reconcile, settle or otherwise resolve the objection to the Claim on behalf of the claimant.

25. A Response must address each ground upon which the Debtors object to a particular Disputed Claim.

26. Timely Response Required; Hearings; Replies. If a Response is properly and timely filed and served in accordance with the above procedures, the Movants 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 September 26, 2024 at 3:00

p.m. (E.T.) 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.

27. If a claimant fails to file and serve a timely Response, then without further notice to the claimant or a hearing, the Movants will present to the Court an appropriate order, substantially in the form of the Proposed Order attached as **Exhibit A** hereto, to grant the relief requested herein.

28. **Adjournment of Hearing**. The Movants 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.

29. **Separate Contested Matter**. The objection by the Movants to each 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**

30. The Movants expressly reserve the right to amend, modify, or supplement this Objection, and to file additional objections to the Disputed Claims or any other claims (filed or not) that may be asserted against the Debtors and their estates.

31. 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 Movants or any successor thereof may have to enforce rights of setoff against the claimants.

32. 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 nonbankruptcy law; (b) a waiver of the Movants' 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 claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

**STATEMENT OF COMPLIANCE WITH LOCAL RULE 3007-1**

33. To the extent that a response is filed regarding any Disputed Claim listed in this Objection and the Movants are unable to resolve the response, each such Disputed Claim, and the objection by the Movants to each such Disputed Claim asserted herein, shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. Any order entered by the Court regarding an objection asserted in the Objection shall be deemed a separate order with respect to each Disputed Claim.

**NOTICE**

34. A copy of this Objection and all related exhibits will be served on (i) the Office of the United States Trustee for the District of Delaware; (ii) each Holder of a Disputed Claim; and (iii) other parties entitled to notice under the Plan and Bankruptcy Rule 2002. The Movants respectfully submit that no further notice of this Objection is required.

35. Pursuant to Bankruptcy Rule 3007, the Movants have provided all claimants affected by this Objection with at least thirty (30) days' notice of the hearing to consider this Objection.

**NO PRIOR REQUEST**

36. No previous request for the relief sought herein has been made to this or any other Court.

**CONCLUSION**

WHEREFORE the Movants respectfully request entry of an order substantially in the form of the Proposed Order attached hereto as **Exhibit A** granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: August 27, 2024

/s/ David M. Klauder

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*Counsel for the Post-Effective Date Debtors*

**EXHIBIT A**

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

In re:

NU RIDE INC., *et al.*,<sup>1</sup>

Reorganized Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**ORDER GRANTING POST-EFFECTIVE DATE DEBTORS' AND  
CLAIMS OMBUDSMAN'S JOINT FOURTH (NON-SUBSTANTIVE)  
OMNIBUS OBJECTION TO CLAIMS  
(Insufficient Documentation, No Liability)**

Upon the *Post-Effective Date Debtors' and Claims Ombudsman's Joint Third (Non-Substantive) Omnibus Objection to Claims (Insufficient Documentations, No Liability)*, (the "Objection")<sup>2</sup>, filed by Nu Ride Inc. and its affiliated reorganized debtors (the "Post-Effective Date Debtors") and Alan Halperin, solely in his capacity as Claims Ombudsman in the above-captioned cases (the "Claims Ombudsman" and together with the Post-Effective Date Debtors, the "Movants") for entry of an order disallowing and expunging in their entirety the claims set forth on **Schedule 1 and 2** hereto (each a "Disputed Claim" and collectively, the "Disputed Claims"), all as more fully set forth in the Objection; and upon the *Declaration of Alan D. Halperin Pursuant to 28 U.S.C. § 1746 and Local Rule 3007-1 in Support of the Post-Effective Date Debtors' and Claims Ombudsman's Joint Fourth (Non-Substantive) Omnibus Objection to Claims (Insufficient Documentation, No Liability)* (the "Halperin Declaration") filed contemporaneously with the Objection and in support thereof; and this Court having jurisdiction to consider the Objection and

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<sup>1</sup> The Reorganized 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 Reorganized Debtors' service address is: Nu Ride Inc. c/o William Gallagher, CEO, M 3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Objection.

the relief requested therein pursuant to 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 pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Objection having been provided, and no other or further notice being required; and the Court having considered all responses to the Objection, if any, and all such responses having been either overruled or withdrawn; and upon all proceedings had before the Court; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and

This Court having **FOUND AND DETERMINED THAT:**

A. Each holder of a Disputed Claim listed on **Schedule 1 and 2** attached hereto was properly and timely served with a copy of the Objection and all of its accompanying exhibits and notice of a hearing on the Objection and response deadline,

B. Any entity known to have an interest in the Disputed Claims subject to the Objection has been afforded reasonable opportunity to respond to, or be heard regarding, the relief requested in the Objection, and

C. The relief requested in the Objection is in the best interests of the Debtors, their estates, their creditors, and other parties in interest;

D. And after due deliberation and sufficient cause appearing therefor,

**IT IS THEREFORE ORDERED THAT:**

1. The Objection is **GRANTED**.
2. Any Response to the Objection not otherwise withdrawn, resolved, or adjourned is overruled on the merits.



3. The Insufficient Documentation Claims listed on **Schedule 1** attached hereto are hereby disallowed and expunged in their entirety.

4. The No Liability Claims listed on **Schedule 2** attached hereto are hereby disallowed and expunged in their entirety.

5. The objection by the Movants to each of the Disputed Claims, as addressed in the Objection, and the schedules 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.

6. 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 other contested matters arising from the Objection or this Order.

7. Nothing in the Objection or this Order shall be construed as an allowance of any Claim.

8. Movants' rights to amend, modify, or supplement the Objection, to file additional objections to the Disputed Claims or any other claims (filed or not) which have or may be asserted against the Debtors or their estates, and to seek further reduction of any Claim, are preserved. Additionally, should one or more of the grounds of objection stated in the Objection be dismissed, the Ombudsman's right to object on other stated grounds or any other grounds that the Ombudsman discovers during the pendency of these Chapter 11 Cases are further preserved.

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

10. The Movants, Verita, and the Clerk of this Court are authorized and directed to

expunge the Disputed Claims on the official claims registry pursuant to this Order and to make other changes to the official claims registry as necessary to reflect the terms of this Order.

11. Nothing in the Objection or this Order, nor any actions or payments made by the Post-Effective Date 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 nonbankruptcy law; (b) a waiver of the Movants' 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 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. This Court shall retain jurisdiction to hear and determine all matters arising from the interpretation and/or implementation of this Order.

Dated: \_\_\_\_\_, 2024  
Wilmington, Delaware

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The Honorable Mary F. Walrath  
United States Bankruptcy Judge

#	Name of Claimant	Claim #	Claim Amount	Claim Type	Reason for Disallowance
1	Ahmed, Shereef	1597	\$0.00 \$0.00 \$0.00 BLANK	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
2	Asif, Muhammad	1005	\$0.00 \$0.00 \$0.00 \$1,069.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
3	Barton, Wayne A.	238	\$0.00 \$0.00 \$0.00 BLANK	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
4	Berger, Tim	470	\$0.00 \$0.00 \$0.00 \$5,443.23	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
5	Buehler, Greg	615	\$0.00 \$0.00 \$18,500.00 \$34,500.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
6	Carleton, Michael D.	1594	\$1,500.00 \$0.00 \$0.00 \$0.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
7	Cataloni, Raymond Christopher	271	\$0.00 \$0.00 \$0.00 \$12,930.86	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
8	Chou, John and Yajane Chu, JT	796	\$0.00 \$0.00 \$0.00 \$50,000.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
9	Colman, Thomas D	1552	\$0.00 \$0.00 \$0.00 BLANK	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
10	Damron, Monica J	108	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
11	Daniels, Calyssa	1574	\$203.56 \$0.00 \$0.00 \$0.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
12	Daniels, Cayla	1573	\$203.54 \$0.00 \$0.00 \$0.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
13	Dargy, Brandi R	828	\$0.00 \$0.00 \$0.00 \$44.45	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.

#	Name of Claimant	Claim #	Claim Amount	Claim Type	Reason for Disallowance
14	Dimov, Svetlin	1489	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
15	Dinh, Trinh	260	\$0.00 \$0.00 \$0.00 BLANK	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
16	Dreger, Jonathan	1048	\$0.00 \$0.00 \$0.00 \$18,000.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
17	Garber, John Joseph	206	\$0.00 \$0.00 \$0.00 \$1,199.66	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
18	Ho, Hoa My	1274	\$4,000.00 \$0.00 \$0.00 \$0.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
19	Jaramillo Jr, Pedro M	897	\$0.00 \$0.00 \$0.00 \$34.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
20	Jones, Randy	69	\$0.00 \$0.00 \$0.00 \$2,000.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
21	Kanj, Jamal	83	\$0.00 \$0.00 \$0.00 \$23,000.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
22	Kloxin, Richard	337	\$0.00 \$0.00 \$0.00 \$5,531.15	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
23	Laginya, Gina	381	\$0.00 \$0.00 \$0.00 \$526.75	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
24	Mathew, Alan	473	\$0.00 \$0.00 \$0.00 \$141.33	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
25	Mulholland, Kevin J	1031	\$0.00 \$0.00 \$0.00 \$3,960.66	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
26	Mulholland, Kevin John	642	\$0.00 \$0.00 \$0.00 \$3,082.63	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.

#	Name of Claimant	Claim #	Claim Amount	Claim Type	Reason for Disallowance
27	Napoles, Raudel	289	\$0.00 \$0.00 \$0.00 BLANK	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
28	Nguyen, Hoa Binh	1551	\$0.00 \$0.00 \$0.00 \$4,800.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
29	Nguyen, Huy Lac	1549	\$0.00 \$0.00 \$0.00 BLANK	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
30	Nguyen, Jason H	1277	\$318.00 \$0.00 \$0.00 \$0.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
31	Okoh, Ifechukwude	1584	\$0.00 \$0.00 \$0.00 BLANK	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
32	Pellerin, Kevin	1565	\$0.00 \$0.00 \$0.00 BLANK	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
33	Philemy, Josiamise Joseph	1536	\$0.00 \$0.00 \$0.00 \$231.49	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
34	Pierburg GmbH	1516	\$0.00 \$0.00 \$0.00 BLANK	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
35	Poujade, Grant	916	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
36	Primavera, Gary E.	1583	\$0.00 \$0.00 \$0.00 \$6,314.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
37	Promsiri, Samantha	562	\$0.00 \$0.00 \$0.00 \$1,025.09	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
38	Ramanathan, Sambandam	1627	\$0.00 \$0.00 \$0.00 \$5,995.69	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
39	Ramirez, Juan C.	1638	\$0.00 \$0.00 \$0.00 \$994.47	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.

#	Name of Claimant	Claim #	Claim Amount	Claim Type	Reason for Disallowance
40	Ricablanca, Genesis	868	\$0.00 \$0.00 \$0.00 \$5,930.25	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
41	Roman, Maria	67	\$0.00 \$0.00 \$0.00 \$259.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
42	Saint-Fleur, Hermann	1535	\$0.00 \$0.00 \$0.00 \$709.44	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
43	Shinn, Doug	1530	\$0.00 \$0.00 \$1,000.00 \$0.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
44	Strickland, Mark	229	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
45	Sudham Group of Companies LLC	670	\$0.00 \$0.00 \$0.00 \$10,000.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
46	Ta, Vina	182	\$0.00 \$0.00 \$0.00 BLANK	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
47	Tejeda, Martin	927	\$0.00 \$0.00 \$0.00 \$680.40	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
48	Urmam, Mark	399	\$0.00 \$0.00 \$0.00 \$250.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
49	Vun, Charlie	600	\$0.00 \$0.00 \$0.00 BLANK	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
50	Xiong, Ruojun	859	\$0.00 \$0.00 \$0.00 \$197,956.08	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
51	Xiong, Ruojun	861	\$0.00 \$0.00 \$0.00 \$264,854.58	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.
52	Yang, Mej-Tzu	1579	\$0.00 \$0.00 \$0.00 \$15,000.00	Administrative Priority Secured Priority General Unsecured	Claimant does not provide sufficient documentation to determine the validity of the claim.

#	Name of Claimant	Claim No.	Claim Amount	Claim Type	Reason for Disallowance
1	Alloway, Robert	1447	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
2	Anderson, William	286	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
3	Arthur, Ann	207	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
4	Barth, Thomas	334	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
5	Blake, Robert	270	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
6	Booth, Talmage	591	\$0.00 \$0.00 \$100.00 \$0.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
7	Briegel, Terry	137	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
8	Clark, Nolan S	93	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
9	Clutch Technologies	1284	\$0.00 \$0.00 \$0.00 \$5,552.00	Administrative Priority Secured Priority General Unsecured	Debtors' books and records reflect that amount claimed was paid to Cox Automotive and no liability remains with the Debtors
10	Collotia, Kamaljit	611	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
11	Eidman, Scott	492	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
12	Foust, Marvin	43	\$0.00 \$0.00 \$100.00 \$0.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
13	GAC R and D Center Silicon Valley, Inc.	1248	\$0.00 \$107,072.28 UNLIQUIDATED UNLIQUIDATED	Administrative Priority Secured Priority General Unsecured	Claim satisfied by claimant's application of security deposit

#	Name of Claimant	Claim No.	Claim Amount	Claim Type	Reason for Disallowance
14	GAC R and D Center Silicon Valley, Inc.	1415	\$0.00 \$107,072.28 UNLIQUIDATED \$0.00	Administrative Priority Secured Priority General Unsecured	Claim satisfied by claimant's application of security deposit
15	Gilliam, James F.	1	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
16	Gwinn, James Paul	195	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
17	Hewlett-Packard Financial Services Company	12	\$0.00 \$0.00 \$0.00 \$8,100.10	Administrative Priority Secured Priority General Unsecured	Debtors' AP system indicates amounts have already been paid
18	Johnson Controls Fire Protection LP	16	\$0.00 \$0.00 \$0.00 \$54,066.50	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate liability assumed and satisfied by Foxconn
19	Julian, Justin	588	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
20	Karadimas, Jason	296	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
21	Kelso, Kris	35	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
22	Law, Charles	657	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
23	Lee, Stephen	678	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
24	Marano, Michael	197	\$0.00 \$0.00 \$100.00 \$0.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
25	Medeiros, Kelli	322	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
26	Melcher, Eleana	1618	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded



#	Name of Claimant	Claim No.	Claim Amount	Claim Type	Reason for Disallowance
27	Nelson, Daniel	866	\$0.00 \$0.00 \$100.00 \$0.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
28	Newcomer, Joseph E.	2	\$0.00 \$0.00 \$100.00 \$0.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
29	Power and Signal Group	434	\$0.00 \$0.00 \$0.00 \$15,558.97	Administrative Priority Secured Priority General Unsecured	Debtors' records do not reflect invoices or any goods delivered
30	Rabah, Maz	519	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
31	Reed, John	856	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
32	Satterwhite, Mike	320	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
33	Smith, Harold	582	\$0.00 \$0.00 \$0.00 \$1,000.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
34	Smith, Peter	459	\$0.00 \$0.00 \$100.00 \$0.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
35	Turner, Robert	172	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
36	U.S. Customs and Border Protection	1563	\$0.00 \$0.00 UNLIQUIDATED \$0.00	Administrative Priority Secured Priority General Unsecured	Claim filed in unliquidated amount and Debtors' books and records do not contain evidence of liability to claimant.
37	Vallero, Daniel Alan	142	\$0.00 \$0.00 \$0.00 \$100.00	Administrative Priority Secured Priority General Unsecured	Debtors' records indicate truck deposit was refunded
38	YRC Inc. dba YRC Freight	1134	\$0.00 \$0.00 \$0.00 \$2,427.51	Administrative Priority Secured Priority General Unsecured	Debtors' books and records do not contain evidence of liability to claimant

# **EXHIBIT B**

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

In re:

NU RIDE INC., *et al.*,<sup>1</sup>

Reorganized Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**DECLARATION OF ALAN D. HALPERIN PURSUANT TO  
28 U.S.C. § 1746 AND LOCAL RULE 3007-1 IN SUPPORT OF THE  
POST-EFFECTIVE DATE DEBTORS' AND CLAIMS OMBUDSMAN'S  
JOINT FOURTH (NON-SUBSTANTIVE) OMNIBUS OBJECTION TO CLAIMS  
(Insufficient Documentation, No Liability)**

Alan D. Halperin, under penalty of perjury, hereby declares as follows:

1. I am the Claims Ombudsman (the "Ombudsman") for the above-captioned debtors (collectively, the "Debtors") and I submit this declaration in support of the *Post-Effective Date Debtors' and Claims Ombudsman's Joint Fourth (Non-Substantive) Omnibus Objection to Claims (Insufficient Documentation, No Liability)* (the "Objection"), pursuant to which I, together with the Post-Effective Date Debtors, am requesting that this Court enter an order disallowing and expunging certain claims filed in the Cases<sup>2</sup>. Unless otherwise stated in this declaration, I have personal knowledge of the facts set forth herein.

2. Except as otherwise indicated, all facts set forth in this declaration are based upon my personal knowledge, my review (or the review of counsel, consultants and other professionals under my supervision) of business records kept by the Debtors in the ordinary course of business,

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<sup>1</sup> The Reorganized 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 Reorganized Debtors' service address is: Nu Ride Inc. c/o William Gallagher, CEO, M 3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Objection.

the relevant proofs of claim, and/or the Claims Register maintained by Verita, the claims and noticing agent in the Cases. The grounds for the Objection are based on the review conducted.

3. I have personally reviewed the Objection and to the best of my knowledge and belief, the information contained on **Schedules 1 and 2** (the “Schedules”) to the Proposed Order attached as **Exhibit A** to the Objection is true and correct.

4. I and/or my counsel, consultants and other professionals reviewed all of the Claims identified in **Schedule 1** to **Exhibit A** to the Objection (the “Insufficient Documentation Claims”) and the supporting documentation, if any, filed therewith, and have determined that they were filed without sufficient documentation to constitute *prima facie* evidence of the validity and amount of the claim asserted. Indeed, in most cases, these claims merely list an amount, without including information, statements, agreements, or other supporting documentation providing indicia of a debt owed by the Debtors. We have reviewed and made reasonable efforts to research and reconcile the Insufficient Documentation Claims with the Debtors’ books and records, and believe that such documentation does not provide *prima facie* evidence of the validity and amount of these claims. Therefore, the Insufficient Documentation Claims should be disallowed and expunged in their entirety.

5. I and/or my counsel, consultants and other professionals reviewed all of the Claims identified in **Schedule 2** to **Exhibit A** to the Objection (the “No Liability Claims”) and the corresponding books and records of the Debtors and have determined that the Debtors have no liability for the underlying debt. We have reviewed and made reasonable efforts to research and reconcile the No Liability Claims with the Debtors’ books and records, and believe that such documentation does not provide *prima facie* evidence of the validity and amount of these claims. In many instances, the Debtors’ books and records reflect that the No Liability Claims in question

have been satisfied. Therefore, the No Liability Claims should be disallowed and expunged in their entirety.

6. Based on the foregoing, and to the best of my knowledge, information and belief, the information contained in the Objection and exhibits thereto is true and correct.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed on: August 27, 2024

/s/ Alan D. Halperin, as Claims Ombudsman  
Alan D. Halperin

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

In re:

NU RIDE INC., *et al.*,<sup>1</sup>

Reorganized Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Hearing Date: September 26, 2024 at 3:00 p.m. (ET)

Objection Deadline: September 12, 2024 at 4:00 p.m. (ET)

**NOTICE OF POST-EFFECTIVE DATE DEBTORS' AND CLAIMS OMBUDSMAN'S  
JOINT FOURTH (NON-SUBSTANTIVE) OMNIBUS OBJECTION TO CLAIMS**

Nu Ride Inc. and its affiliated reorganized debtors in the above-captioned proceeding (the “Post-Effective Date Debtors”) and Alan Halperin, solely in his capacity as Claims Ombudsman (the “Claims Ombudsman” and together with the Post-Effective Date Debtors, the “Movants”), by and through their respective counsel, filed the fourth omnibus (non-substantive) omnibus objection to claims (the “Objection”), which seeks to alter your rights by disallowing or modifying your claim for the reasons stated in the attached Objection. In the Objection, the Movants object to certain proofs of claim filed in the above-referenced case. If you disagree with the proposed treatment of your proof of claim, you must timely file a response to the Objection.

PLEASE TAKE FURTHER NOTICE that responses to the Objection must contain the following:

- (a) a concise statement setting forth the reasons why such claim should not be modified for the reasons set forth in the Objection, including (but not limited to) the specific factual and legal bases upon which the claimant will rely in opposing the Objection;

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<sup>1</sup> The Reorganized 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 Reorganized Debtors' service address is: Nu Ride Inc. c/o William Gallagher, CEO, M 3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

- (b) all documentation or other evidence of the claim, to the extent not included with the proof of claim previously filed with the Bankruptcy Court, upon which the claimant will rely in opposing the Objection at the hearing;
- (c) the addresses to which Movants must return any reply to the Objection; and
- (d) the name, address and telephone number of the person (which may be the claimant or his/her its legal representative) possessing ultimate authority to reconcile, settle, or otherwise resolve the claim on behalf of the claimant.

PLEASE TAKE FURTHER NOTICE that if you fail to timely file and serve a response in accordance with the above requirements, you will be deemed to have concurred with, and consented to, the Objection and the relief requested therein, and Movants will present to the Court (without further notice to you), an appropriate order sustaining the Objection.

You are required to file a response to the Objection, if any, on or before **September 12, 2024, at 4:00 p.m. (ET)**.

At the same time, you must also serve a copy of the response upon:

David M. Klauder  
**BIELLI & KLAUDER, LLC**  
1204 N. King Street  
Wilmington, DE 19801  
dklauder@bk-legal.com

A HEARING ON THE OBJECTION WILL BE HELD BEFORE THE HONORABLE MARY F. WALRATH, UNITED STATES BANKRUPTCY COURT, 824 NORTH MARKET STREET, 5<sup>TH</sup> FLOOR, COURTROOM #4, WILMINGTON, DELAWARE 19801 AT **3:00 P.M. (ET) ON SEPTEMBER 26, 2024.**

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING

Dated: August 27, 2024

**BIELLI & KLAUDER LLC**

/s/ David M. Klauder

David M. Klauder (No. 5769)  
1204 N. King Street  
Wilmington, DE 19801  
Telephone: (302) 803-4600  
E-mail: [dklauder@bk-legal.com](mailto:dklauder@bk-legal.com)

*Counsel for the Claims Ombudsman*