

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

In re:

NU RIDE INC., *et al.*,¹

Reorganized Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: D.I. 1296

**CERTIFICATION OF COUNSEL REGARDING FURTHER REVISED ORDER
APPROVING POST-EFFECTIVE DATE DEBTORS' AND CLAIMS OMBUDSMAN'S
JOINT THIRD (NON-SUBSTANTIVE) OMNIBUS OBJECTION TO CLAIMS
(Duplicate, Amended and Superseded)**

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 undersigned counsel, hereby certify as follows:

1. On August 27, 2024, the Movants filed the *Post-Effective Date Debtors' and Claims Ombudsman's Joint Third (Non-Substantive) Omnibus Objection to Claims (Duplicate, Amended and Superseded)* (the “Objection”) with the United States Bankruptcy Court for the District of Delaware (the “Court”). The notice filed with the Objection established a deadline of September 12, 2024 at 4:00 p.m. (ET) to respond to the Objection. A hearing on the Objection was held on September 26, 2024 at 3:00 p.m. (ET).

2. At the request of the Court, Movants have further revised the proposed order to reflect the withdrawal of the Objection with respect to claim number 1006 filed by Muhammad Asif.

¹ 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.



3. Attached hereto as **Exhibit A** is a further revised proposed order approving the Objection. Attached hereto as **Exhibit B** is a redline of the revised proposed order against the proposed order filed with the Certification of Counsel filed on September 24, 2024 at Docket Number 1332.

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WHEREFORE, the Movants respectfully request that the proposed order attached hereto as **Exhibit A** be entered at the Court's earliest convenience.

Dated: September 27, 2024
Wilmington, Delaware

Respectfully submitted,

/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: | Chapter 11 |
| NU RIDE INC., <i>et al.</i> , ¹ | Case No. 23-10831 (MFW) |
| Reorganized Debtors. | (Jointly Administered) |
| | Re: D.I. <u>1296</u> |

**ORDER GRANTING POST-EFFECTIVE DATE DEBTORS' AND
CLAIMS OMBUDSMAN'S JOINT THIRD (NON-SUBSTANTIVE)
OMNIBUS OBJECTION TO CLAIMS
(Duplicate, Amended and Superseded)**

Upon the *Post-Effective Date Debtors' and Claims Ombudsman's Joint Third (Non-Substantive) Omnibus Objection to Claims (Duplicate, Amended and Superseded)* (the "Objection")², 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 Third (Non-Substantive) Omnibus Objection to Claims (Duplicate,*

¹ 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.

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

Amended and Superseded) (the “Halperin Declaration”) filed contemporaneously with the Objection and in support thereof; and this Court having jurisdiction to consider the Objection and 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 Duplicate Claims listed in the column entitled “Duplicate Claims to be Disallowed” on **Schedule 1** attached hereto are hereby disallowed and expunged in their entirety.

4. The Amended and Superseded Claims listed in the column entitled “Amended Claim to be Disallowed” 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, Surviving 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.

| | | Duplicate Claim to be Disallowed | | | Surviving Claim | | | |
|---|--------------------------------|----------------------------------|--|---|-----------------|--|---|---|
| # | Name of Claimant | Claim No. | Claim Amount | Claim Type | Claim No. | Claim Amount | Claim Type | Reason for Disallowance* |
| 1 | Anderson Jr, Joseph | 1402 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1401 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1402 is duplicative of Claim 1401 |
| 2 | Anderson Jr, Joseph | 1407 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1401 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1407 is duplicative of Claim 1401 |
| 3 | Cairone, David C. | 382 | \$0.00 \$0.00 \$0.00 \$639.65 | Administrative Priority Secured Priority General Unsecured | 697 | \$0.00 \$0.00 \$0.00 \$639.65 | Administrative Priority Secured Priority General Unsecured | Claim 382 is duplicative of Claim 697 |
| 4 | Coniglio-Kirk, Jill | 1423 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | 1422 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | Claim 1423 is duplicative of Claim 1422 |
| 5 | Coniglio-Kirk, Jill | 1424 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | 1422 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | Claim 1424 is duplicative of Claim 1422 |
| 6 | Daniel, Geevarughese & Lilly C | 504 | \$0.00 \$0.00 \$0.00 \$28,260.00 | Administrative Priority Secured Priority General Unsecured | 503 | \$0.00 \$0.00 \$0.00 \$28,260.00 | Administrative Priority Secured Priority General Unsecured | Claim 504 is duplicative of Claim 503 |
| 7 | Daniel, Geevarughese & Lilly C | 505 | \$0.00 \$0.00 \$0.00 \$28,260.00 | Administrative Priority Secured Priority General Unsecured | 503 | \$0.00 \$0.00 \$0.00 \$28,260.00 | Administrative Priority Secured Priority General Unsecured | Claim 505 is duplicative of Claim 503 |
| 8 | Duong, Hien Q | 274 | \$0.00 \$0.00 \$0.00 \$45,565.86 | Administrative Priority Secured Priority General Unsecured | 488 | \$0.00 \$0.00 \$0.00 \$45,565.86 | Administrative Priority Secured Priority General Unsecured | Claim 274 is duplicative of Claim 488 |

| | | Duplicate Claim to be Disallowed | | | Surviving Claim | | | |
|----|------------------------|----------------------------------|--|---|-----------------|--|---|---|
| # | Name of Claimant | Claim No. | Claim Amount | Claim Type | Claim No. | Claim Amount | Claim Type | Reason for Disallowance* |
| 9 | Feldman, Keith | 1146 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1139 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1146 is duplicative of Claim 1139 |
| 10 | Feldman, Keith | 1149 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1139 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1149 is duplicative of Claim 1139 |
| 11 | Globestar Systems Inc. | 1420 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1399 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1420 is duplicative of Claim 1399 |
| 12 | Globestar Systems Inc. | 1421 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1399 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1421 is duplicative of Claim 1399 |
| 13 | Ibarra Jr, Adolfo | 1409 | \$0.00 \$0.00 \$0.00 \$9,999.60 | Administrative Priority Secured Priority General Unsecured | 1408 | \$0.00 \$0.00 \$0.00 \$9,999.60 | Administrative Priority Secured Priority General Unsecured | Claim 1409 is duplicative of Claim 1408 |
| 14 | Jiang, Galen X | 1358 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1381 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1358 is duplicative of Claim 1381 |
| 15 | Langdon, Judy | 1520 | \$0.00 \$0.00 \$0.00 \$1,944.10 | Administrative Priority Secured Priority General Unsecured | 625 | \$0.00 \$0.00 \$0.00 \$1,944.10 | Administrative Priority Secured Priority General Unsecured | Claim 1520 is duplicative of Claim 625 |
| 16 | Libby, Kenneth D. | 1466 | \$0.00 \$0.00 \$0.00 \$411.77 | Administrative Priority Secured Priority General Unsecured | 1182 | \$0.00 \$0.00 \$0.00 \$411.77 | Administrative Priority Secured Priority General Unsecured | Claim 1466 is duplicative of Claim 1182 |

| | | Duplicate Claim to be Disallowed | | | Surviving Claim | | | |
|----|----------------------|----------------------------------|--|---|-----------------|--|---|---|
| # | Name of Claimant | Claim No. | Claim Amount | Claim Type | Claim No. | Claim Amount | Claim Type | Reason for Disallowance* |
| 17 | Libby, Kenneth D. | 1495 | \$0.00 \$0.00 \$0.00 \$411.77 | Administrative Priority Secured Priority General Unsecured | 1182 | \$0.00 \$0.00 \$0.00 \$411.77 | Administrative Priority Secured Priority General Unsecured | Claim 1495 is duplicative of Claim 1182 |
| 18 | Libby, Kenneth D. | 1502 | \$0.00 \$0.00 \$0.00 \$411.77 | Administrative Priority Secured Priority General Unsecured | 1182 | \$0.00 \$0.00 \$0.00 \$411.77 | Administrative Priority Secured Priority General Unsecured | Claim 1502 is duplicative of Claim 1182 |
| 19 | Lopez V., J Demetrio | 778 | \$0.00 \$0.00 \$0.00 \$2,839.29 | Administrative Priority Secured Priority General Unsecured | 875 | \$0.00 \$0.00 \$0.00 \$2,839.29 | Administrative Priority Secured Priority General Unsecured | Claim 778 is duplicative of Claim 875 |
| 20 | Nandlall, Deovitree | 735 | \$0.00 \$0.00 \$0.00 \$4,135.00 | Administrative Priority Secured Priority General Unsecured | 733 | \$0.00 \$0.00 \$0.00 \$4,135.00 | Administrative Priority Secured Priority General Unsecured | Claim 735 is duplicative of Claim 733 |
| 21 | Nikoo, Majid | 1643 | \$0.00 \$0.00 \$0.00 \$773.98 | Administrative Priority Secured Priority General Unsecured | 1035 | \$0.00 \$0.00 \$0.00 \$773.98 | Administrative Priority Secured Priority General Unsecured | Claim 1643 is duplicative of Claim 1035 |
| 22 | Pabbathi, Ashith | 1377 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1376 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1377 is duplicative of Claim 1376 |
| 23 | Pabbathi, Ashith | 1378 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1376 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1378 is duplicative of Claim 1376 |
| 24 | Ramirez, Juan Carlos | 975 | \$0.00 \$0.00 \$0.00 \$994.47 | Administrative Priority Secured Priority General Unsecured | 999 | \$0.00 \$0.00 \$0.00 \$994.47 | Administrative Priority Secured Priority General Unsecured | Claim 975 is duplicative of Claim 999 |

| | | Duplicate Claim to be Disallowed | | | Surviving Claim | | | |
|----|-------------------------------|----------------------------------|--|---|-----------------|--|---|---|
| # | Name of Claimant | Claim No. | Claim Amount | Claim Type | Claim No. | Claim Amount | Claim Type | Reason for Disallowance* |
| 25 | Reiss, Jane | 1201 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1198 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1201 is duplicative of Claim 1198 |
| 26 | Reiss, Jane | 1286 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1198 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1286 is duplicative of Claim 1198 |
| 27 | RITSON, JANE | 1235 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1234 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1235 is duplicative of Claim 1234 |
| 28 | RITSON, JANE | 1238 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1234 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1238 is duplicative of Claim 1234 |
| 29 | Rock, Joseph | 324 | \$0.00 \$0.00 \$0.00 \$4,140.24 | Administrative Priority Secured Priority General Unsecured | 295 | \$0.00 \$0.00 \$0.00 \$4,140.24 | Administrative Priority Secured Priority General Unsecured | Claim 324 is duplicative of Claim 295 |
| 30 | Sancrainte, Robert Matthew | 73 | \$0.00 \$0.00 \$0.00 \$2,068.97 | Administrative Priority Secured Priority General Unsecured | 1577 | \$0.00 \$0.00 \$0.00 \$2,068.97 | Administrative Priority Secured Priority General Unsecured | Claim 73 is duplicative of Claim 1577 |
| 31 | Soave, Laura | 1404 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1403 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1404 is duplicative of Claim 1403 |
| 32 | Soave, Laura | 1405 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1403 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1405 is duplicative of Claim 1403 |

| | | Duplicate Claim to be Disallowed | | | Surviving Claim | | | |
|----|------------------|----------------------------------|--|---|-----------------|--|---|---|
| # | Name of Claimant | Claim No. | Claim Amount | Claim Type | Claim No. | Claim Amount | Claim Type | Reason for Disallowance* |
| 33 | Spencer, Dale | 1165 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1159 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1165 is duplicative of Claim 1159 |
| 34 | Spencer, Dale G. | 1160 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1159 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1160 is duplicative of Claim 1159 |
| 35 | Strand, Angela | 1350 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1311 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1350 is duplicative of Claim 1311 |
| 36 | Strand, Angela | 1355 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1311 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1355 is duplicative of Claim 1311 |
| 37 | Tavares, Daniel | 1397 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1395 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1397 is duplicative of Claim 1395 |
| 38 | Tavares, Daniel | 1398 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1395 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1398 is duplicative of Claim 1395 |
| 39 | Urmam, Mark | 399 | \$0.00 \$0.00 \$0.00 \$250.00 | Administrative Priority Secured Priority General Unsecured | 1545 | \$0.00 \$0.00 \$0.00 \$250.00 | Administrative Priority Secured Priority General Unsecured | Claim 399 is duplicative of Claim 1545 |
| 40 | Watne, Matthew T | 57 | \$0.00 \$0.00 \$0.00 \$2,785.00 | Administrative Priority Secured Priority General Unsecured | 63 | \$0.00 \$0.00 \$0.00 \$2,785.00 | Administrative Priority Secured Priority General Unsecured | Claim 57 is duplicative of Claim 63 |

| | | Duplicate Claim to be Disallowed | | | Surviving Claim | | | |
|----|----------------------|----------------------------------|--|---|-----------------|--|---|---|
| # | Name of Claimant | Claim No. | Claim Amount | Claim Type | Claim No. | Claim Amount | Claim Type | Reason for Disallowance* |
| 41 | Watne, Matthew T | 58 | \$0.00 \$0.00 \$0.00 \$2,785.00 | Administrative Priority Secured Priority General Unsecured | 63 | \$0.00 \$0.00 \$0.00 \$2,785.00 | Administrative Priority Secured Priority General Unsecured | Claim 58 is duplicative of Claim 63 |
| 42 | Wilson, Ross A | 1633 | \$0.00 \$0.00 \$0.00 \$1,305.00 | Administrative Priority Secured Priority General Unsecured | 521 | \$0.00 \$0.00 \$0.00 \$1,305.00 | Administrative Priority Secured Priority General Unsecured | Claim 1633 is duplicative of Claim 521 |
| 43 | Workhorse Group Inc. | 1183 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1168 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1183 is duplicative of Claim 1168 |
| 44 | Yau, Kevin | 446 | \$0.00 \$0.00 \$0.00 \$15,127.00 | Administrative Priority Secured Priority General Unsecured | 448 | \$0.00 \$0.00 \$0.00 \$15,127.00 | Administrative Priority Secured Priority General Unsecured | Claim 446 is duplicative of Claim 448 |

**As the Plan provides the Debtors' estates are substantively consolidated for purposes of making Distributions, duplicate claims filed 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.*

| | | Amended Claim to be Disallowed | | | Surviving Claim | | | |
|---|-----------------------|-----------------------------------|--|---|-----------------|--|---|--|
| # | Name of Claimant | Claim No. | Claim Amount | Claim Type | Claim No. | Claim Amount | Claim Type | Reason for Disallowance |
| 1 | Anderson Jr, Joseph | 1255 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1402 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1255 is amended and superseded by Claim 1402 |
| 2 | Anderson Jr, Joseph | 1256 | \$0.00 \$0.00 \$0.00 BLANK | Administrative Priority Secured Priority General Unsecured | 1407 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1256 is amended and superseded by Claim 1407 |
| 3 | Brose do Brasil Ltda. | 1263 | \$0.00 \$0.00 \$0.00 \$1,921,755.73 | Administrative Priority Secured Priority General Unsecured | 1602 | \$0.00 \$0.00 \$0.00 \$1,808,815.77 | Administrative Priority Secured Priority General Unsecured | Claim 1263 is amended and superseded by Claim 1602 |
| 4 | Burns, Steve | 1258 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | 1619 | \$0.00 \$0.00 UNLIQUIDATED UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1258 is amended and superseded by Claim 1619 |
| 5 | Chuang, Shu Jung T | 1141 | \$0.00 \$0.00 \$10,779.46 \$0.00 | Administrative Priority Secured Priority General Unsecured | 1288 | \$0.00 \$0.00 \$25,000.00 \$0.00 | Administrative Priority Secured Priority General Unsecured | Claim 1141 is amended and superseded by Claim 1288 |
| 6 | Cole, Goffery K. | 217 | \$0.00 \$0.00 \$0.00 \$289,112.39 | Administrative Priority Secured Priority General Unsecured | 454 | \$0.00 \$0.00 \$0.00 \$289,057.89 | Administrative Priority Secured Priority General Unsecured | Claim 217 is amended and superseded by Claim 454 |
| 7 | Coniglio-Kirk, Jill | 1136 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1423 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | Claim 1136 is amended and superseded by Claim 1423 |
| 8 | Coniglio-Kirk, Jill | 1131 | \$0.00 \$0.00 \$0.00 \$130,000.00 | Administrative Priority Secured Priority General Unsecured | 1422 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | Claim 1131 is amended and superseded by Claim 1422 |

| | | Amended Claim to be Disallowed | | | Surviving Claim | | | |
|----|--|-----------------------------------|--|---|-----------------|--|---|--|
| # | Name of Claimant | Claim No. | Claim Amount | Claim Type | Claim No. | Claim Amount | Claim Type | Reason for Disallowance |
| 9 | HILBERT, BRYAN | 1133 | \$0.00 \$0.00 \$0.00 \$106,811.14 | Administrative Priority Secured Priority General Unsecured | 1253 | \$0.00 \$0.00 \$0.00 \$38,050.00 | Administrative Priority Secured Priority General Unsecured | Claim 1133 is amended and superseded by Claim 1253 |
| 10 | Jiang, Yvonne | 1179 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1396 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1179 is amended and superseded by Claim 1396 |
| 11 | Kerzich, Christopher | 460 | \$0.00 \$0.00 \$6,300.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 536 | \$0.00 \$0.00 \$28,845.00 \$0.00 | Administrative Priority Secured Priority General Unsecured | Claim 460 is amended and superseded by Claim 536 |
| 12 | Mondal, Debashis | 1287 | \$0.00 \$0.00 \$0.00 \$5,600.00 | Administrative Priority Secured Priority General Unsecured | 1292 | \$0.00 \$0.00 \$0.00 \$6,600.00 | Administrative Priority Secured Priority General Unsecured | Claim 1287 is amended and superseded by Claim 1292 |
| 13 | Nelson Mullins Riley and Scarborough LLP | 1093 | \$0.00 \$0.00 \$0.00 \$4,408.01 | Administrative Priority Secured Priority General Unsecured | 1555 | \$0.00 \$0.00 \$0.00 \$2,341.50 | Administrative Priority Secured Priority General Unsecured | Claim 1093 is amended and superseded by Claim 1555 |
| 14 | Pathmanathan, Vino | 1428 | \$0.00 \$0.00 \$0.00 \$25,000.00 | Administrative Priority Secured Priority General Unsecured | 1435 | \$0.00 \$0.00 \$0.00 \$23,174.17 | Administrative Priority Secured Priority General Unsecured | Claim 1428 is amended and superseded by Claim 1435 |
| 15 | Port, Michael H. | 1236 | \$0.00 \$0.00 \$0.00 \$167,500.00 | Administrative Priority Secured Priority General Unsecured | 1279 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | Claim 1236 is amended and superseded by Claim 1279 |
| 16 | Schmidt, Rich | 1257 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | 1624 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | Claim 1257 is amended and superseded by Claim 1624 |

| | | Amended Claim to be Disallowed | | | Surviving Claim | | | |
|----|---|-----------------------------------|--|---|-----------------|---|---|--|
| # | Name of Claimant | Claim No. | Claim Amount | Claim Type | Claim No. | Claim Amount | Claim Type | Reason for Disallowance |
| 17 | SINHA, PANKAJ | 664 | \$0.00 \$0.00 \$0.00 \$5,631.28 | Administrative Priority Secured Priority General Unsecured | 792 | \$0.00 \$0.00 \$0.00 \$5,644.87 | Administrative Priority Secured Priority General Unsecured | Claim 664 is amended and superseded by Claim 792 |
| 18 | The Timken Company and The Timken Corporation | 1218 | \$0.00 \$316,514.00 \$0.00 \$0.00 | Administrative Priority Secured Priority General Unsecured | 1591 | \$0.00 No less than \$316,514.00 \$0.00 \$0.00 | Administrative Priority Secured Priority General Unsecured | Claim 1218 is amended and superseded by Claim 1591 |
| 19 | Watne, Matthew T | 59 | \$0.00 \$0.00 \$0.00 \$2,785.00 | Administrative Priority Secured Priority General Unsecured | 63 | \$0.00 \$0.00 \$0.00 \$2,785.00 | Administrative Priority Secured Priority General Unsecured | Claim 59 is amended and superseded by Claim 63 |
| 20 | Weese, Curtis T | 864 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1113 | \$0.00 \$0.00 \$0.00 \$371,519.83 | Administrative Priority Secured Priority General Unsecured | Claim 864 is amended and superseded by Claim 1113 |
| 21 | Wong, Steven | 166 | \$0.00 \$0.00 \$0.00 \$292.38 | Administrative Priority Secured Priority General Unsecured | 175 | \$0.00 \$0.00 \$0.00 \$292.38 | Administrative Priority Secured Priority General Unsecured | Claim 166 is amended and superseded by Claim 175 |

Exhibit B

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

In re:

NU RIDE INC., *et al.*,¹

Reorganized Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: **D.I. 1296**

**ORDER GRANTING POST-EFFECTIVE DATE DEBTORS' AND
CLAIMS OMBUDSMAN'S JOINT THIRD (NON-SUBSTANTIVE)
OMNIBUS OBJECTION TO CLAIMS
(Duplicate, Amended and Superseded)**

Upon the *Post-Effective Date Debtors' and Claims Ombudsman's Joint Third (Non-Substantive) Omnibus Objection to Claims (Duplicate, Amended and Superseded)* (the "Objection")², 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 Third (Non-Substantive) Omnibus Objection to Claims (Duplicate,*

¹ 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.

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

Amended and Superseded) (the “Halperin Declaration”) filed contemporaneously with the Objection and in support thereof; and this Court having jurisdiction to consider the Objection and 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 Duplicate Claims listed in the column entitled “Duplicate Claims to be Disallowed” on **Schedule 1** attached hereto are hereby disallowed and expunged in their entirety.

4. The Amended and Superseded Claims listed in the column entitled “Amended Claim to be Disallowed” 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, Surviving 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.

| Duplicate Claim to be Disallowed | | | | | Surviving Claim | | | |
|----------------------------------|--------------------------------|-----------------|--|---|-----------------|--|---|--|
| # | Name of Claimant | Claim No. | Claim Amount | Claim Type | Claim No. | Claim Amount | Claim Type | Reason for Disallowance* |
| 1 | Anderson Jr, Joseph | 1402 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1401 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1402 is duplicative of Claim 1401 |
| 2 | Anderson Jr, Joseph | 1407 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1401 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1407 is duplicative of Claim 1401 |
| 3 | Asif, Muhammad | 1005 | \$0.00 \$0.00 \$0.00 \$1,069.00 | Administrative Priority Secured Priority General Unsecured | 1504 | \$0.00 \$0.00 \$0.00 \$293.24 | Administrative Priority Secured Priority General Unsecured | Claim 1005 is duplicative of Claim 1504 |
| 43 | Cairone, David C. | 382 | \$0.00 \$0.00 \$0.00 \$639.65 | Administrative Priority Secured Priority General Unsecured | 697 | \$0.00 \$0.00 \$0.00 \$639.65 | Administrative Priority Secured Priority General Unsecured | Claim 382 is duplicative of Claim 697 |
| 54 | Coniglio-Kirk, Jill | 1423 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | 1422 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | Claim 1423 is duplicative of Claim 1422 |
| 65 | Coniglio-Kirk, Jill | 1424 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | 1422 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | Claim 1424 is duplicative of Claim 1422 |
| 76 | Daniel, Geevarughese & Lilly C | 504 | \$0.00 \$0.00 \$0.00 \$28,260.00 | Administrative Priority Secured Priority General Unsecured | 503 | \$0.00 \$0.00 \$0.00 \$28,260.00 | Administrative Priority Secured Priority General Unsecured | Claim 504 is duplicative of Claim 503 |

| | | | | | | | | |
|-----------------|--------------------------------|------|--|---|------|--|---|---|
| 87 | Daniel, Geevarughese & Lilly C | 505 | \$0.00 \$0.00 \$0.00 \$28,260.00 | Administrative Priority Secured Priority General Unsecured | 503 | \$0.00 \$0.00 \$0.00 \$28,260.00 | Administrative Priority Secured Priority General Unsecured | Claim 505 is duplicative of Claim 503 |
| 98 | Duong, Hien Q | 274 | \$0.00 \$0.00 \$0.00 \$45,565.86 | Administrative Priority Secured Priority General Unsecured | 488 | \$0.00 \$0.00 \$0.00 \$45,565.86 | Administrative Priority Secured Priority General Unsecured | Claim 274 is duplicative of Claim 488 |
| 409 | Feldman, Keith | 1146 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1139 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1146 is duplicative of Claim 1139 |
| 4410 | Feldman, Keith | 1149 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1139 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1149 is duplicative of Claim 1139 |
| 4211 | Globestar Systems Inc. | 1420 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1399 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1420 is duplicative of Claim 1399 |
| 4312 | Globestar Systems Inc. | 1421 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1399 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1421 is duplicative of Claim 1399 |
| 4413 | Ibarra Jr, Adolfo | 1409 | \$0.00 \$0.00 \$0.00 \$9,999.60 | Administrative Priority Secured Priority General Unsecured | 1408 | \$0.00 \$0.00 \$0.00 \$9,999.60 | Administrative Priority Secured Priority General Unsecured | Claim 1409 is duplicative of Claim 1408 |
| 4514 | Jiang, Galen X | 1358 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1381 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1358 is duplicative of Claim 1381 |
| 4615 | Langdon, Judy | 1520 | \$0.00 \$0.00 \$0.00 \$1,944.10 | Administrative Priority Secured Priority General Unsecured | 625 | \$0.00 \$0.00 \$0.00 \$1,944.10 | Administrative Priority Secured Priority General Unsecured | Claim 1520 is duplicative of Claim 625 |

| | | | | | | | | |
|-------------------------|----------------------|------|--|--|------|--|--|---|
| 17 <u>16</u> | Libby, Kenneth D. | 1466 | \$0.00 \$0.00 \$0.00 \$411.77 | Administrative Priority Secured Priority General Unsecured | 1182 | \$0.00 \$0.00 \$0.00 \$411.77 | Administrative Priority Secured Priority General Unsecured | Claim 1466 is duplicative of Claim 1182 |
| 18 <u>17</u> | Libby, Kenneth D. | 1495 | \$0.00 \$0.00 \$0.00 \$411.77 | Administrative Priority Secured Priority General Unsecured | 1182 | \$0.00 \$0.00 \$0.00 \$411.77 | Administrative Priority Secured Priority General Unsecured | Claim 1495 is duplicative of Claim 1182 |
| 19 <u>18</u> | Libby, Kenneth D. | 1502 | \$0.00 \$0.00 \$0.00 \$411.77 | Administrative Priority Secured Priority General Unsecured | 1182 | \$0.00 \$0.00 \$0.00 \$411.77 | Administrative Priority Secured Priority General Unsecured | Claim 1502 is duplicative of Claim 1182 |
| 20 <u>19</u> | Lopez V., J Demetrio | 778 | \$0.00 \$0.00 \$0.00 \$2,839.29 | Administrative Priority Secured Priority General Unsecured | 875 | \$0.00 \$0.00 \$0.00 \$2,839.29 | Administrative Priority Secured Priority General Unsecured | Claim 778 is duplicative of Claim 875 |
| 21 <u>20</u> | Nandlall, Deovitree | 735 | \$0.00 \$0.00 \$0.00 \$4,135.00 | Administrative Priority Secured Priority General Unsecured | 733 | \$0.00 \$0.00 \$0.00 \$4,135.00 | Administrative Priority Secured Priority General Unsecured | Claim 735 is duplicative of Claim 733 |
| 22 <u>21</u> | Nikoo, Majid | 1643 | \$0.00 \$0.00 \$0.00 \$773.98 | Administrative Priority Secured Priority General Unsecured | 1035 | \$0.00 \$0.00 \$0.00 \$773.98 | Administrative Priority Secured Priority General Unsecured | Claim 1643 is duplicative of Claim 1035 |
| 23 <u>22</u> | Pabbathi, Ashith | 1377 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1376 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1377 is duplicative of Claim 1376 |
| 24 <u>23</u> | Pabbathi, Ashith | 1378 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1376 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1378 is duplicative of Claim 1376 |
| 25 <u>24</u> | Ramirez, Juan Carlos | 975 | \$0.00 \$0.00 \$0.00 \$994.47 | Administrative Priority Secured Priority General Unsecured | 999 | \$0.00 \$0.00 \$0.00 \$994.47 | Administrative Priority Secured Priority General Unsecured | Claim 975 is duplicative of Claim 999 |

| | | | | | | | | |
|-------------------------|----------------------------------|------|--|---|------|--|---|---|
| 26 <u>25</u> | Reiss, Jane | 1201 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1198 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1201 is duplicative of Claim 1198 |
| 27 <u>26</u> | Reiss, Jane | 1286 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1198 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1286 is duplicative of Claim 1198 |
| 28 <u>27</u> | RITSON, JANE | 1235 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1234 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1235 is duplicative of Claim 1234 |
| 29 <u>28</u> | RITSON, JANE | 1238 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1234 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1238 is duplicative of Claim 1234 |
| 30 <u>29</u> | Rock, Joseph | 324 | \$0.00 \$0.00 \$0.00 \$4,140.24 | Administrative Priority Secured Priority General Unsecured | 295 | \$0.00 \$0.00 \$0.00 \$4,140.24 | Administrative Priority Secured Priority General Unsecured | Claim 324 is duplicative of Claim 295 |
| 31 <u>30</u> | Sancrainte, Robert Matthew | 73 | \$0.00 \$0.00 \$0.00 \$2,068.97 | Administrative Priority Secured Priority General Unsecured | 1577 | \$0.00 \$0.00 \$0.00 \$2,068.97 | Administrative Priority Secured Priority General Unsecured | Claim 73 is duplicative of Claim 1577 |
| 32 <u>31</u> | Soave, Laura | 1404 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1403 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1404 is duplicative of Claim 1403 |
| 33 <u>32</u> | Soave, Laura | 1405 | \$0.00\$0.00\$0.00 UNLIQUIDATED | Administrative PrioritySecuredPriorit yGeneral Unsecured | 1403 | \$0.00\$0.00\$0.00 UNLIQUIDATED | Administrative PrioritySecuredPriorit yGeneral Unsecured | Claim 1405 is duplicative of Claim 1403 |
| 34 <u>33</u> | Spencer, Dale | 1165 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1159 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1165 is duplicative of Claim 1159 |

| | | | | | | | | |
|-----------------------------|------------------|------|--|--|------|--|--|---|
| <u>3534</u> | Spencer, Dale G. | 1160 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1159 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1160 is duplicative of Claim 1159 |
| <u>3635</u> | Strand, Angela | 1350 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1311 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1350 is duplicative of Claim 1311 |
| <u>3736</u> | Strand, Angela | 1355 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1311 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1355 is duplicative of Claim 1311 |
| <u>3837</u> | Tavares, Daniel | 1397 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1395 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1397 is duplicative of Claim 1395 |
| <u>3938</u> | Tavares, Daniel | 1398 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1395 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1398 is duplicative of Claim 1395 |
| <u>4039</u> | Urmam, Mark | 399 | \$0.00 \$0.00 \$0.00 \$250.00 | Administrative Priority Secured Priority General Unsecured | 1545 | \$0.00 \$0.00 \$0.00 \$250.00 | Administrative Priority Secured Priority General Unsecured | Claim 399 is duplicative of Claim 1545 |
| <u>4140</u> | Watne, Matthew T | 57 | \$0.00 \$0.00 \$0.00 \$2,785.00 | Administrative Priority Secured Priority General Unsecured | 63 | \$0.00 \$0.00 \$0.00 \$2,785.00 | Administrative Priority Secured Priority General Unsecured | Claim 57 is duplicative of Claim 63 |
| <u>4241</u> | Watne, Matthew T | 58 | \$0.00 \$0.00 \$0.00 \$2,785.00 | Administrative Priority Secured Priority General Unsecured | 63 | \$0.00 \$0.00 \$0.00 \$2,785.00 | Administrative Priority Secured Priority General Unsecured | Claim 58 is duplicative of Claim 63 |
| <u>4342</u> | Wilson, Ross A | 1633 | \$0.00 \$0.00 \$0.00 \$1,305.00 | Administrative Priority Secured Priority General Unsecured | 521 | \$0.00 \$0.00 \$0.00 \$1,305.00 | Administrative Priority Secured Priority General Unsecured | Claim 1633 is duplicative of Claim 521 |

| | | | | | | | | |
|-------------|----------------------|------|--|---|------|--|---|---|
| <u>4443</u> | Workhorse Group Inc. | 1183 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1168 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1183 is duplicative of Claim 1168 |
| <u>4544</u> | Yau, Kevin | 446 | \$0.00 \$0.00 \$0.00 \$15,127.00 | Administrative Priority Secured Priority General Unsecured | 448 | \$0.00 \$0.00 \$0.00 \$15,127.00 | Administrative Priority Secured Priority General Unsecured | Claim 446 is duplicative of Claim 448 |

**As the Plan provides the Debtors' estates are substantively consolidated for purposes of making Distributions, duplicate claims filed 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.*

| | | Amended Claim to be Disallowed | | | Surviving Claim | | | |
|---|-----------------------|-----------------------------------|--|---|-----------------|--|---|--|
| # | Name of Claimant | Claim No. | Claim Amount | Claim Type | Claim No. | Claim Amount | Claim Type | Reason for Disallowance |
| 1 | Anderson Jr, Joseph | 1255 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1402 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1255 is amended and superseded by Claim 1402 |
| 2 | Anderson Jr, Joseph | 1256 | \$0.00 \$0.00 \$0.00 BLANK | Administrative Priority Secured Priority General Unsecured | 1407 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1256 is amended and superseded by Claim 1407 |
| 3 | Brose do Brasil Ltda. | 1263 | \$0.00 \$0.00 \$0.00 \$1,921,755.73 | Administrative Priority Secured Priority General Unsecured | 1602 | \$0.00 \$0.00 \$0.00 \$1,808,815.77 | Administrative Priority Secured Priority General Unsecured | Claim 1263 is amended and superseded by Claim 1602 |
| 4 | Burns, Steve | 1258 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | 1619 | \$0.00 \$0.00 UNLIQUIDATED UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1258 is amended and superseded by Claim 1619 |
| 5 | Chuang, Shu Jung T | 1141 | \$0.00 \$0.00 \$10,779.46 \$0.00 | Administrative Priority Secured Priority General Unsecured | 1288 | \$0.00 \$0.00 \$25,000.00 \$0.00 | Administrative Priority Secured Priority General Unsecured | Claim 1141 is amended and superseded by Claim 1288 |
| 6 | Cole, Goffery K. | 217 | \$0.00 \$0.00 \$0.00 \$289,112.39 | Administrative Priority Secured Priority General Unsecured | 454 | \$0.00 \$0.00 \$0.00 \$289,057.89 | Administrative Priority Secured Priority General Unsecured | Claim 217 is amended and superseded by Claim 454 |
| 7 | Coniglio-Kirk, Jill | 1136 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1423 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | Claim 1136 is amended and superseded by Claim 1423 |
| 8 | Coniglio-Kirk, Jill | 1131 | \$0.00 \$0.00 \$0.00 \$130,000.00 | Administrative Priority Secured Priority General Unsecured | 1422 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | Claim 1131 is amended and superseded by Claim 1422 |

| | | Amended Claim to be Disallowed | | | Surviving Claim | | | |
|----|--|-----------------------------------|--|---|-----------------|--|---|--|
| # | Name of Claimant | Claim No. | Claim Amount | Claim Type | Claim No. | Claim Amount | Claim Type | Reason for Disallowance |
| 9 | HILBERT, BRYAN | 1133 | \$0.00 \$0.00 \$0.00 \$106,811.14 | Administrative Priority Secured Priority General Unsecured | 1253 | \$0.00 \$0.00 \$0.00 \$38,050.00 | Administrative Priority Secured Priority General Unsecured | Claim 1133 is amended and superseded by Claim 1253 |
| 10 | Jiang, Yvonne | 1179 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1396 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | Claim 1179 is amended and superseded by Claim 1396 |
| 11 | Kerzich, Christopher | 460 | \$0.00 \$0.00 \$6,300.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 536 | \$0.00 \$0.00 \$28,845.00 \$0.00 | Administrative Priority Secured Priority General Unsecured | Claim 460 is amended and superseded by Claim 536 |
| 12 | Mondal, Debashis | 1287 | \$0.00 \$0.00 \$0.00 \$5,600.00 | Administrative Priority Secured Priority General Unsecured | 1292 | \$0.00 \$0.00 \$0.00 \$6,600.00 | Administrative Priority Secured Priority General Unsecured | Claim 1287 is amended and superseded by Claim 1292 |
| 13 | Nelson Mullins Riley and Scarborough LLP | 1093 | \$0.00 \$0.00 \$0.00 \$4,408.01 | Administrative Priority Secured Priority General Unsecured | 1555 | \$0.00 \$0.00 \$0.00 \$2,341.50 | Administrative Priority Secured Priority General Unsecured | Claim 1093 is amended and superseded by Claim 1555 |
| 14 | Pathmanathan, Vino | 1428 | \$0.00 \$0.00 \$0.00 \$25,000.00 | Administrative Priority Secured Priority General Unsecured | 1435 | \$0.00 \$0.00 \$0.00 \$23,174.17 | Administrative Priority Secured Priority General Unsecured | Claim 1428 is amended and superseded by Claim 1435 |
| 15 | Port, Michael H. | 1236 | \$0.00 \$0.00 \$0.00 \$167,500.00 | Administrative Priority Secured Priority General Unsecured | 1279 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | Claim 1236 is amended and superseded by Claim 1279 |
| 16 | Schmidt, Rich | 1257 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | 1624 | \$0.00 \$0.00 UNLIQUIDATED \$0.00 | Administrative Priority Secured Priority General Unsecured | Claim 1257 is amended and superseded by Claim 1624 |

| | | Amended Claim to be Disallowed | | | Surviving Claim | | | |
|----|--|-----------------------------------|--|---|-----------------|--|---|--|
| # | Name of Claimant | Claim No. | Claim Amount | Claim Type | Claim No. | Claim Amount | Claim Type | Reason for Disallowance |
| 17 | SINHA, PANKAJ | 664 | \$0.00 \$0.00 \$0.00 \$5,631.28 | Administrative Priority Secured Priority General Unsecured | 792 | \$0.00 \$0.00 \$0.00 \$5,644.87 | Administrative Priority Secured Priority General Unsecured | Claim 664 is amended and superseded by Claim 792 |
| 18 | The Timken Company and The Timken Corporation | 1218 | \$0.00 \$316,514.00 \$0.00 \$0.00 | Administrative Priority Secured Priority General Unsecured | 1591 | \$0.00 No less than \$316,514.00 \$0.00 \$0.00 | Administrative Priority Secured Priority General Unsecured | Claim 1218 is amended and superseded by Claim 1591 |
| 19 | Watne, Matthew T | 59 | \$0.00 \$0.00 \$0.00 \$2,785.00 | Administrative Priority Secured Priority General Unsecured | 63 | \$0.00 \$0.00 \$0.00 \$2,785.00 | Administrative Priority Secured Priority General Unsecured | Claim 59 is amended and superseded by Claim 63 |
| 20 | Weese, Curtis T | 864 | \$0.00 \$0.00 \$0.00 UNLIQUIDATED | Administrative Priority Secured Priority General Unsecured | 1113 | \$0.00 \$0.00 \$0.00 \$371,519.83 | Administrative Priority Secured Priority General Unsecured | Claim 864 is amended and superseded by Claim 1113 |
| 21 | Wong, Steven | 166 | \$0.00 \$0.00 \$0.00 \$292.38 | Administrative Priority Secured Priority General Unsecured | 175 | \$0.00 \$0.00 \$0.00 \$292.38 | Administrative Priority Secured Priority General Unsecured | Claim 166 is amended and superseded by Claim 175 |