

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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U.S. BANKRUPTCY COURT
DISTRICT OF DELAWARE

<i>In re.</i>		Chapter 11
NU RIDE INC., et al.,		Case No. 23-10831 (MFW)
Reorganized Debtors.		Jointly Administered
Rahul Singh		
Pravesh Singh		
Renu Singh		
Appellants'		
vs.		
NU-RIDE fka Lordstown Motor Corp.		
Claim Ombudsman		
Appellees'		

**APPELLANTS' STATEMENT OF ISSUES ON APPEAL FROM BANKRUPTCY COURT AND
DESIGNATION OF RECORDS**

I. Statement of Issues on Appeal

1. Whether the Bankruptcy Court erred by disallowing the Singh Claims and rejecting the "old" Debtors (prior to reorganized) assertion that the Singh Claims 8-11 could be "claims subject to subordination under section 510(b) of the Bankruptcy Code (which have the same priority as equity)."?



2. Whether the Bankruptcy court erred by disallowing the Singh claims and rejecting the Equity Committees assertion that “Singh Claims, therefore, are not general unsecured claims, but rather are Claims subject to subordination to pursuant to section 510(b) of the Bankruptcy Code”?
3. Whether the Bankruptcy Court erred by disallowing the Singh Claims and rejecting the Official Committee of Unsecured Creditors assertion that “Because the Claims apparently seek either rescission of or damages arising from the purchase of securities of a Debtor, they are subject to mandatory subordination under 11 U.S.C. § 510(b).”?
4. Whether the Bankruptcy Court erred by disallowing Singh Claims and accepting reorganized Debtors and Claims Ombudsman reasoning that “While certain of the Informal and Formal Responses raise allegations of fraud and misinformation, those allegations stem from claimants’ equity ownership and are not independent of such equity ownership” and hence should be disallowed (even though here for one to be a victim of Debtors fraud and crime, one had to purchase shares)?
5. Whether the Bankruptcy Court erred in not extending the claims bar date as more and more fraud and crime of the Debtors against shareholders was unearthed in bankruptcy proceedings past the claims bar date?
6. Whether the Bankruptcy Court erred by disallowing all **1050** or so defrauded common stock shareholders claims with the reasoning that common stock shareholders cannot file claims under any and all circumstances including being defrauded by the Debtors?

II. Designation of Record

1. Docket #1432, November 26, 2024. Order Sustaining Post-Effective Date Debtors and Claims Ombudsman’s Joint Sixth and Eight Omnibus (Non-substantive) Objection to Certain Equity Interest Claims.
2. Docket # 1366. October 14, 2024. Post-Effective Date Debtors and Claims Ombudsman’s Joint Sixth and Eight Omnibus (Non-substantive) Objection to Certain Equity Interest Claims.

3. Docket # 1404. November 8, 2024. Response/Objection of Rahul Singh (Claim 8) to Post-Effective Date Debtors and Claims Ombudsman's Joint Sixth and Eight Omnibus (Non-substantive) Objection to Certain Equity Interest Claims (Docket # 1366).
4. Docket # 1412. November 8, 2024. Response/Objection of Rahul Singh (Claim 9) to Post-Effective Date Debtors and Claims Ombudsman's Joint Sixth and Eight Omnibus (Non-substantive) Objection to Certain Equity Interest Claims (Docket # 1366).
5. Docket # 1413. November 8, 2024. Response/Objection of Pravesh Singh (Claim 10) to Post-Effective Date Debtors and Claims Ombudsman's Joint Sixth and Eight Omnibus (Non-substantive) Objection to Certain Equity Interest Claims (Docket # 1366).
6. Docket # 1414. November 8, 2024. Response/Objection of Renu Singh (Claim 11) to Post-Effective Date Debtors and Claims Ombudsman's Joint Sixth and Eight Omnibus (Non-substantive) Objection to Certain Equity Interest Claims (Docket # 1366).
7. Docket # 1417. November 21, 2024. Reorganized Debtors Omnibus Reply in Support of the Post-Effective Date Debtors and Claims Ombudsman's Joint Sixth and Eight Omnibus (Non-substantive) Objection to Certain Equity Interest Claims.
8. Docket # 1431, November 26, 2024. Audio File of Hearing on November 26, 2024.
9. Docket # 1308, September 12, 2024. Joint Motion of the Post-Effective Date Debtor And Claims Ombudsman for Entry of an Order (I) Granting Limited Relief From Federal Rule of Bankruptcy Procedure 3007, and (II) Granting Related Relief.
10. Docket # 1325, September 19, 2024. Objection of Rahul Singh to Joint Motion of the Post-Effective Date Debtor And Claims Ombudsman for Entry of an Order (I) Granting Limited Relief From Federal Rule of Bankruptcy Procedure 3007, and (II) Granting Related Relief.
11. Docket # 1328, September 23, 2024. Reply in Further Support of Joint Motion of the Post-Effective Date Debtor And Claims Ombudsman for Entry of an Order (I) Granting Limited Relief From Federal Rule of Bankruptcy Procedure 3007, and (II) Granting Related Relief.

12. Docket # 1350, September 27, 2024. Order Granting Joint Motion of the Post-Effective Date Debtor And Claims Ombudsman for Entry of an Order (I) Granting Limited Relief From Federal Rule of Bankruptcy Procedure 3007, and (II) Granting Related Relief.
13. Docket # 494, September 29, 2023. Motion of Rahul Singh for Relief to Defrauded Shareholders.
14. Docket # 538, October 11, 2023. Debtors Objection to Motion of Rahul Singh for Relief to Defrauded Shareholders.
15. Docket # 541, October 11, 2023. The Official Committee of Unsecured Creditors' Objection to Motion of Rahul Singh for Relief to Defrauded Shareholders.
16. Docket # 543, October 11, 2023. Joinder of the Official Committee of Equity Security Holders of Lordstown Motor Corp., et al. to the Debtors Objection to the Motion of Rahul Singh for Relief to Defrauded Shareholders.
17. Docket # 608, October 24, 2023. Transcript Regarding Hearing on Motion of Rahul Singh for Relief to Defrauded Shareholders Held on October 18, 2023.
18. Docket # 583, October 11, 2023. PDF File with Audio File Attachment of Hearing on October 18, 10:28 AM.
19. Docket # 601, October 23, 2023. Order Denying Motion of Rahul Singh for Relief to Defrauded Shareholders.
20. Docket # 370, September 5, 2023. Motion to Compel Payback to Defrauded Shareholders.
21. Docket # 371, September 6 2023. Notice of Deficiency re Motion to Compel Payback to Defrauded Shareholders.
22. Docket # 1030, February 29, 2024. Notice of Filing of Offer of Settlement and of Order Instituting Cease-and-Desist Proceedings Pursuant to Section 8A of the Securities Act of 1993 and Section 21C of the Securities Exchange Act of 1934, Making Findings, And Imposing a Cease-And-Desist Order.

23. Claim 8 of Rahul Singh, <http://veritaglobal.net/lordstown/register>. Copy to be Provided to Clerk of the Court.

24. Claim 9 of Rahul Singh, <http://veritaglobal.net/lordstown/register>. Copy to be Provided to Clerk of the Court.

25. Claim 10 of Pravesh Singh, <http://veritaglobal.net/lordstown/register>. Copy to be Provided to Clerk of the Court.

26. Claim 11 of Renu Singh, <http://veritaglobal.net/lordstown/register>. Copy to be Provided to Clerk of the Court.

Dated: December 9, 2024

Respectfully submitted by:

/s/ Rahul Singh /s/ Pravesh Singh /s/ Renu Singh

Rahul Singh Pravesh Singh Renu Singh

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CERTIFICATE OF SERVICE

I, Rahul Singh, hereby certify that, on December 9, 2024, I served a true and correct copy of:

APPELLANTS' STATEMENT OF ISSUES ON APPEAL FROM BANKRUPTCY COURT AND
DESIGNATION OF RECORDS

by email to counsel:

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and (b) Honorable Judge Mary Walrath via Laurie M. Capp, Courtroom Deputy to the Honorable
Judge Mary Walrath

(Laurie_Capp@deb.uscourts.gov).

Dated December 9, 2024.

Respectfully submitted by

/s/ Rahul Singh

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