

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

In re:	)	Chapter 11
	)	
NU RIDE INC. <i>et al.</i> ,	)	Bankruptcy Case No. 23-10831-MFW
	)	(Jointly Administered)
Reorganized Debtors.	)	
	)	
RAHUL SINGH, PRAVESH SINGH, and	)	
RENU SINGH,	)	
	)	Civil Action No. 1:24-cv-01318-MN
Appellants,	)	
v.	)	
	)	
NU RIDE INC. <i>et al.</i> ,	)	
	)	
Appellees.	)	
	)	

**APPELLEES' COUNTER-DESIGNATION PURSUANT TO FED. R. BANKR. P. 8009  
OF ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

Nu Ride Inc., et al., (together the “Reorganized Debtors”) and Alan Halperin, solely in his capacity as Claims Ombudsman (the “Claims Ombudsman” and together with the Reorganized Debtors, the “Appellees”), by and through their counsel pursuant to Rule 8009(a)(2) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), hereby designate the following additional items to be included in the record on appeal of the above-captioned appeal.

**Designations of Additional Items to be Included in the Record on Appeal<sup>1</sup>**

**A. Documents filed on the main bankruptcy case docket<sup>2</sup>**

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<sup>1</sup> The items designated herein include all exhibits, attachments or other papers included within each docket entry for such item. In addition to these items, Appellees hereby incorporate the Designations of Record filed by the appellants.

<sup>2</sup> The chapter 11 cases are jointly administered. Docket numbers used herein refer to the Bankruptcy Court’s docket in the Debtors’ main case, *Nu Ride Inc., et al.* (f/k/a *Lordstown Motors Corp., et al.*, Case No. 23-10831 (MFW), unless otherwise provided.



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Item	Date Filed/Entered	ECF No.	Description
1			Complete Docket Report for <i>In re Nu-Ride Inc.</i> , Case # 23-10831-MFW, in the United States Bankruptcy Court, District of Delaware, from 6/27/2023 through 12/16/2024
2	10/19/2023	590	Certificate of Service of Esmeralda Aguayo re: Debtors' Objection to Motion of Rahul Singh for Relief to Defrauded Shareholders (Filed by Kurtzman Carson Consultants LLC)
3	10/20/2023	595	Certification of Counsel Regarding Order Denying Motion of Rahul Singh for Relief to Defrauded Shareholders (Filed by Lordstown Motors Corp.)
4	11/1/2023	651	Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief
5	11/01/2023	657	Amended Chapter 11 Plan // <i>Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors (Solicitation Version)</i> Filed by Lordstown Motors Corp.
6	11/1/2023	658	Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors (Filed by Lordstown Motors Corp.)
7	12/01/2023	766	Plan Supplement/ Notice of Filing of Plan Supplement for the Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors, Filed by Lordstown Motors Corp. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H)
8	12/7/2023	793	Objection of Rahul Singh to Debtor's Plan (Docket # 766) (Filed by Rahul Singh)
9	1/31/2024	941	Second Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors (Filed by Lordstown Motors Corp.)

10	2/12/2024	964	Objection of Rahul Singh to Debtors' Second Motion to Extend the Debtors' Exclusive Periods to File and Solicit Votes on a Chapter 11 Plan (Filed by Rahul Singh)
11	2/13/2024	969	Order Granting Continuance of Debtors' Second Motion to Extend the Debtors' Exclusive Periods to File and Solicit Votes on a Chapter 11 Plan
12	2/28/2024	1014	Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors (Filed by Lordstown Motors Corp.)
13	3/1/2024	1034	Debtors' Memorandum of Law in Support of Confirmation of Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors (Filed by Lordstown Motors Corp.) (related documents include #793)
14	3/1/2024	1039	Official Committee of Unsecured Creditors' Joinder to Debtors' Memorandum of Law in Support of Confirmation of Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors (Filed by Official Committee of Unsecured Creditors) (related documents include #793)
15	3/1/2024	1040	Joinder of the Official Committee of Equity Security Holders to Debtors' Memorandum of Law in Support of Confirmation of the Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors (Filed by Official Committee of Equity Security Holders)
16	3/1/2024	1036	Declaration of Adam Kroll in Support of Confirmation of Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors (Filed by Lordstown Motors Corp.)
17	3/1/2024	1035	Declaration of Daniel A. Ninivaggi in Support of Confirmation of Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors (Filed by Lordstown Motors Corp.)
18	03/04/2024	1057	Plan Supplement - Notice of Filing of Third Supplemental Plan Supplement for the Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors (Filed by Lordstown Motors Corp.)

19	3/4/2024	1060	Objection of Rahul Singh to Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motor Corp. and its Affiliated Debtors (Docket# 1014) (Filed by Rahul Singh)
20	3/6/2024	1069	Order (I) Confirming Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors and (II) Granting Related Relief
21	3/6/2024	1066	Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors (Filed by Lordstown Motors Corp.)
22	3/12/2024	1093	Transcript of Plan Confirmation Hearing held on 03/05/24
23	3/13/2024	1096	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 (Filed by Lordstown Motors Corp.)
24	9/12/2024	1310	Notice of Withdrawal of Docket No. 1308
25	9/12/2024	1311	Joint Motion of the Post-Effective Date Debtors and Claims Ombudsman for Entry of an Order (I) Granting Limited Relief from Federal Rule of Bankruptcy Procedure 3007, and (II) Granting Related Relief -- Filed by Alan D. Halperin.
26	9/26/2024	1346	Sign-in Sheet for Hearing on 9-26-24 re Joint Motion (no. 1311)
27	10/07/2024	1360	Transcript of Hearing held on 9-26-24
28	11/25/2024	1425	Amended Notice of Agenda of Matters Scheduled for Hearing on November 26, 2024 at 11:30 a.m. (ET) [Hearing scheduled for 11/26/2024 at 11:30 am at US Bankruptcy Court, 824 Market St., 5th Fl., Courtroom #4, Wilmington, Delaware] (Filed by Nu Ride Inc.)
29	12/4/2024	1440	Clerk's Notice Regarding Filing of Appeal [BAP: 24-71] (related document(s) [1437])
30	12/4/2024	1439	Transmittal of Record on Appeal to District Court (Attachments: # (1) Notice of Appeal #1437 (2) Order on Appeal #1432)

31	12/4/2024	1438	Notice of Filing Fee(s) Due From Rahul Singh. Filing Fee of \$298 Due by 12/16/2024.
32	12/4/2024	1437	Notice of Appeal. Receipt Number 00000000, Fee Amount \$298. (related document(s)[1432]) Appellants listed as: Rahul Singh, Pravesh Singh, Renu Singh. Appellees listed as: Post-effective Debtors, Nu Ride Inc. Filed by Rahul Singh. (KAR)
33	12/6/2024	1443	BNC Certificate of Mailing. (related document(s)[1440]) Notice Date 12/06/2024.
34	12/10/2024	1445	Statement of Issues on Appeal (related document(s) [1437]) Filed by Rahul Singh.
35	12/16/2024	1444	Notice of Docketing Record on Appeal to District Court. Civil Action Number:24-1318; BAP Number: 24-71. (related document(s) [1437], [1439])

*[Remainder of Page Intentionally Left Blank]*

Dated: December 23, 2024

Respectfully submitted,  
**BIELLI & KLAUDER LLC**

/s/ David M. Klauder

David M. Klauder (No. 5769)

Ryan M. Ernst (No. 4788)

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*Special Counsel to the Post-Effective Date  
Debtors and Co-Counsel to the Claims  
Ombudsman*

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NU RIDE INC. <i>et al.</i> ,	)	
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Appellees.	)	
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**CERTIFICATE OF SERVICE**

I, David M. Klauder, Esq., hereby certify that on December 23, 2024 a true and correct copy of the *Appellees' Counter-Designation Pursuant to Fed. R. Bankr. P. 8009 of Additional Items to be Included in the Record on Appeal* was served via First Class U.S. Mail upon the following parties:

Rahul Singh  
2061 Argentum Ave.  
Indian Land, SC 29707

Pravesh Singh  
2061 Argentum Ave.  
Indian Land, SC 29707

Renu Singh  
2061 Argentum Ave.  
Indian Land, SC 29707

Dated: December 23, 2024

**BIELLI & KLAUDER LLC**

/s/ David M. Klauder

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*Special Counsel to the Post-Effective Date  
Debtors and Co-Counsel to the Claims  
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