

**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)

**Obj. Deadline: February 18, 2025, 4:00 p.m.**  
**Hearing Date: February 25, 2025, at 11:30 a.m.**

**CERTIFICATION OF COUNSEL REGARDING SUPPLEMENTAL ORDER  
APPROVING POST-EFFECTIVE DATE DEBTORS' AND CLAIMS OMBUDSMAN'S  
JOINT FOURTH (NON-SUBSTANTIVE) OMNIBUS OBJECTION TO CLAIMS  
(Insufficient Documentation, No Liability)**

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 Fourth (Non-Substantive) Omnibus Objection to Claims (Insufficient Documentation, No Liability)* (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.

2. On September 12, 2024, Johnson Controls Fire Protection LP ("JCFP") filed *Johnson Controls Fire Protection LP's Response to Objection to Fourth (Non-Substantive) Omnibus Objection to Claims* (the "JCFP Response") [Docket No. 1309] opposing the Objection with respect to Claim 16 filed by JCFP. Through a series of extensions, the hearing with respect

<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.



to the Objection to Claim 16 was adjourned to the hearing scheduled for February 25, 2025 at 10:30 a.m. (ET).

3. On November 1, 2024, the Court entered the *Order Granting Post-Effective Date Debtors' and Claims Ombudsman's Joint Fourth (Non-Substantive) Omnibus Objection to Claims (Insufficient Documentation, No Liability Claims)* [Docket No. 1396].

4. On February 17, 2025, JCFP filed the *Notice of Withdrawal of Docket No. 1309 Johnson Controls Fire Protection LP's Response to Objection to Fourth (Non-Substantive) Omnibus Objection to Claims* [Docket No. 1472] to withdraw the JCFP Response.

5. As JCFP has withdrawn its opposition to the Objection, the Movants submit a proposed supplemental order to sustain the Objection with respect to Claim 16.

6. Attached hereto as **Exhibit A** is a proposed supplemental order approving the Objection to Claim 16.

*[Remainder of page intentionally left blank]*

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

Dated: February 20, 2025  
Wilmington, Delaware

Respectfully submitted,

/s/ David M. Klauder

**BIELLI & KLAUDER LLC**

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)

-and-

**HALPERIN BATTAGLIA BENZIJA,  
LLP**

Walter Benzija  
Keara M. Waldron  
40 Wall Street, 37<sup>th</sup> Floor  
New York, NY 10005  
Telephone: (212) 765-9100  
Facsimile: (212) 765-0964  
E-mail: [wbenzija@halperinlaw.net](mailto:wbenzija@halperinlaw.net)  
E-mail: [kwaldron@halperinlaw.net](mailto:kwaldron@halperinlaw.net)

*Counsel for the Claims Ombudsman*

**MORRIS JAMES LLP**

Eric J. Monzo (DE Bar No. 5214)  
Brya M. Keilson (DE Bar No. 4643)  
500 Delaware Avenue, Suite 1500  
Wilmington, Delaware 19801  
Telephone: (302) 888-6800  
Facsimile: (302) 571-1750  
E-mail: [emonzo@morrisjames.com](mailto:emonzo@morrisjames.com)  
E-mail: [bkeilson@morrisjames.com](mailto:bkeilson@morrisjames.com)

**BROWN RUDNICK LLP**

Robert J. Stark (admitted *pro hac vice*)  
Bennett S. Silverberg (admitted *pro hac vice*)  
Michael S. Winograd (admitted *pro hac vice*)  
7 Times Square  
New York, NY 10036  
Telephone: (212) 209-4800  
Facsimile: (212) 209-4801  
E-mail: [rstark@brownrudnick.com](mailto:rstark@brownrudnick.com)  
E-mail: [bsilverberg@brownrudnick.com](mailto:bsilverberg@brownrudnick.com)  
E-mail: [mwinograd@brownrudnick.com](mailto:mwinograd@brownrudnick.com)

-and-

Sharon I. Dwoskin (admitted *pro hac vice*)  
Matthew A. Sawyer (admitted *pro hac vice*)  
One Financial Center  
Boston, MA 02111  
Telephone: (617) 856-8200  
Facsimile: (617)-856-8201  
E-mail: [sdwoskin@brownrudnick.com](mailto:sdwoskin@brownrudnick.com)  
E-mail: [msawyer@brownrudnick.com](mailto:msawyer@brownrudnick.com)

*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)

**Re: Docket No. 1297, 1396**

**SUPPLEMENTAL 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 Fourth (Non-Substantive) Omnibus Objection to Claims (Insufficient Documentation, 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 the claims set forth on **Schedules 1 and 2** of the Proposed Order attached thereto (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*

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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.

*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 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** 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 *Order Granting Post-Effective Date Debtors' and Claims Ombudsman's Joint Fourth (Non-Substantive) Omnibus Objection to Claims (Insufficient Documentation, No Liability)* (the "Fourth Omnibus Order") [Docket No. 1396] is hereby supplemented and amended as set forth herein.
4. Claim 16 listed on **Schedule 1** is disallowed.
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 Movants' right to object on other stated grounds or any other grounds that the Movants discover



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 amend the official claims registry to reflect the disallowance of the Disputed Claims 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.

#	Name of Claimant	Claim No.	Claim Amount	Claim Type	Reason for Disallowance
1	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