

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

In re:

NU RIDE INC., *et al.*,

Reorganized Debtors.¹

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

COHEN RECYCLING, INC.,

Plaintiff and
Counterdefendant,

v.

Adv. Pro. No. 24-50127 (MFW)

NU RIDE INC.,

Defendant and
Counterclaimant.

**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON FEBRUARY 25, 2025 AT 10:30 A.M. (ET)**

**** AS NO MATTERS ARE SCHEDULED TO GO FORWARD, THIS HEARING HAS
BEEN CANCELLED WITH PERMISSION OF THE COURT ****

RESOLVED MATTERS:

1. Post-Effective Date Debtors' and Claims Ombudsman's Joint Fourth (Non-Substantive) Omnibus Objection to Claims [Filed August 27, 2024; [Docket No. 1297](#)].

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

Objection/Response(s) Received:

- A. Johnson Controls Fire Protection LP's Response to Fourth (Non-Substantive) Omnibus Objection to Claims [Filed September 12, 2024; [Docket No. 1309](#)].

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.



Related Documents:

- A. Certification of Counsel Regarding Order Approving Post-Effective Date Debtors' and Claims Ombudsman's Joint Fourth (Non-Substantive) Omnibus Objection to Claims [Filed September 24, 2024; [Docket No. 1333](#)].
- B. Notice of Submission of Proofs of Claim in Connection with the Post-Effective Date Debtors' and Claims Ombudsman's Joint Fourth (Non-Substantive) Omnibus Objection to Claims [Filed September 26, 2024; [Docket No. 1343](#)].
- C. Notice of Submission of Proofs of Claim in Connection with the Post-Effective Date Debtors' and Claims Ombudsman's Joint Fourth (Non-Substantive) Omnibus Objection to Claims (Insufficient Documentation, No Liability) [Filed October 2, 2024; [Docket No. 1358](#)].
- D. Declaration of Michael Port in Further Support of the Post-Effective Date Debtors' and Claims Ombudsman's Joint Fourth (Non-Substantive) Omnibus Objection to Claims [Filed October 31, 2024; [Docket No. 1394](#)].
- E. Certification of Counsel Regarding Order Approving Post-Effective Date Debtors' and Claims Ombudsman's Joint Fourth (Non-Substantive) Omnibus Objection to Claims (Insufficient Documentation, No Liability) [Filed October 31, 2024; [Docket No. 1395](#)].
- F. Order Granting Post-Effective Date Debtors' and Claims Ombudsman's Joint Fourth (Non-Substantive) Omnibus Objection to Claims (Insufficient Documentation, No Liability) [Entered November 1, 2024; [Docket No. 1396](#)].
- G. Notice of Withdrawal of Docket No. 1309 Johnson Controls Fire Protection LP's Response to Objection to Fourth (Non-Substantive) Omnibus Objection to Claims [Filed February 17, 2025; [Docket No. 1472](#)].
- H. 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) [Filed February 20, 2025; [Docket No. 1474](#)].

Status: Johnson Controls Fire Protection LP has withdrawn its opposition to the Fourth Omnibus Objection. A proposed supplemental order to sustain the Fourth Omnibus Objection with respect to Claim 16 has been submitted under certification of counsel. Upon entry of the supplemental order, this matter will be fully resolved. Accordingly, a hearing on this matter is no longer required.

2. Post-Effective Date Debtors' Fifth Motion for Entry of an Order Extending the Deadline by Which Post-Effective Date Debtors May File Notices to Remove Action [Filed January 17, 2025; [Docket No. 1459](#)].

Objection Deadline: January 31, 2025 at 4:00 p.m. (ET).

Objection/Response(s) Received: None.

Related Documents:

- A. Certificate of No Objection Regarding Post-Effective Date Debtors' Fifth Motion for Entry of an Order Extending the Deadline by Which Post-Effective Date Debtors May File Notices to Remove Action [Filed February 6, 2025; [Docket No. 1466](#)].
- B. Order Extending the Deadline by Which Post-Effective Date Debtors May File Notices to Remove Action [Entered February 6, 2025; [Docket No. 1467](#)].

Status: An Order has been entered by the Court. Accordingly, a hearing on this matter is no longer required.

ADJOURNED MATTERS:

3. Post-Effective Date Debtors' and Claims Ombudsman's Joint Fifth (Non-Substantive) Omnibus Objection to Claims [Filed August 27, 2024; [Docket No. 1298](#)].

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

Objection/Response(s) Received:

- A. Joseph A Camp's Response to Post-Effective Date Debtors' and Claims Ombudsman's Joint Fifth (Non-Substantive) Omnibus Objection to Claims [Filed September 11, 2024; [Docket No. 1312](#)].
- B. As further explained in the *Certification of Counsel Regarding Order Approving Post-Effective Date Debtors' and Claims Ombudsman's Joint Fifth (Non-Substantive) Omnibus Objection to Claims*, the Movants received informal comments from Julio Rodriguez.

Related Documents:

- A. Certification of Counsel Regarding Order Approving Post-Effective Date Debtors' and Claims Ombudsman's Joint Fifth (Non-Substantive) Omnibus Objection to Claims [Filed September 24, 2024; [Docket No. 1334](#)].

- B. Order Granting Post-Effective Date Debtors' and Claims Ombudsman's Joint Fifth (Non-Substantive) Omnibus Objection to Claims (Late Filed Claims) [Filed September 25, 2024; [Docket No. 1336](#)].

Status: The objection with respect to Joseph A Camp's claim number 1559 is withdrawn. The objection with respect to Julio Rodriguez's claim number 1611 is adjourned to a date to be determined and noticed. A revised form of order was submitted to reflect the removal of claim number 1559 and claim number 1611 from Schedule 1 thereto. An order has been entered by the Court sustaining the Joint Fifth Omnibus Objection to Claims, other than those continued matters.

ADVERSARY PROCEEDING:

Adv. Pro. No. 24-50127 (MFW) Cohen Recycling, Inc. v. Nu Ride Inc.

- 4. First Amended Complaint for Declaratory Relief [Filed September 26, 2024; Adv. D.I. 3].

Response Deadline: September 5, 2024.

Response(s) Received:

- A. Nu Ride Inc.'s Answer, Affirmative Defenses, and Counterclaims [Filed October 9, 2024; Adv. D.I. 5].
- B. Cohen Recycling, Inc.'s Answers and Affirmative Defenses to Nu Ride Inc.'s Counterclaims [Filed October 30, 2024; Adv. D.I. 16].

Related Documents:

- A. Stipulation of Voluntary Dismissal Without Prejudice of Adversary Proceeding (as to Foxconn Defendants) [Filed October 21, 2024; Adv. D.I. 7].
- B. Certification of Counsel Regarding Proposed Scheduling Order for an Adversary Proceeding [Filed October 28, 2024; Adv. D.I. 14].
- C. Scheduling Order for Adversary Proceeding [Filed October 28, 2024; Adv. D.I. 15].
- D. Certification of Counsel Regarding Order Approving Stipulation Regarding Case Schedule [Filed January 9, 2025; Adv. D.I. 31].

E. Order Approving Stipulation Regarding Case Schedule [Filed January 13, 2025; Adv. D.I. 32].

Status: The Parties have settled the claims at issue in this adversary proceeding. A motion for entry of an order approving the Stipulation and Settlement Agreement is scheduled for March 11, 2025 at 3:00 p.m. A pretrial conference on this matter is no longer necessary.

Dated: February 21, 2025
Wilmington, Delaware

MORRIS JAMES LLP

/s/ Brya M. Keilson

Eric J. Monzo (DE Bar No. 5214)
Brya M. Keilson (DE Bar No. 4643)
Siena B. Cerra (DE Bar No. 7290)
500 Delaware Avenue, Suite 1500
Wilmington, DE 19801
Telephone: (302) 888-6800
E-mail: emonzo@morrisjames.com
bkeilson@morrisjames.com
scerra@morrisjames.com

-and-

BROWN RUDNICK LLP

Robert J. Stark (admitted *pro hac vice*)
Bennett S. Silverberg (admitted *pro hac vice*)
Alexander F. Kasnetz (admitted *pro hac vice*)
7 Times Square
New York, NY 10036
Telephone: (212) 209-4800
E-mail: rstark@brownrudnick.com
bsilverberg@brownrudnick.com
akasnetz@brownrudnick.com

-and-

Sharon I. Dvoskin (admitted *pro hac vice*)
Matthew A. Sawyer (admitted *pro hac vice*)
One Financial Center
Boston, MA 02111
Telephone: (617) 856-8200
E-mail: sdvoskin@brownrudnick.com
msawyer@brownrudnick.com

Counsel to the Post-Effective Date Debtors