Case 23-10831-MFW Doc 1/18/ Filed 03/06/25

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re

NU RIDE INC., et al.,¹

Reorganized Debtors.

Chapter 11

Case Nos. 23-10831 (MFW), et seq.

(Jointly Administered)

STIPULATION WITHDRAWING MOTION FOR (A) ENTRY OF AN ORDER ENFORCING THE VEHICLE DECOMMISSION ORDER AND (B) FOR RELATED RELIEF AND OBJECTION THERETO

(relates to Docket No. 1314, 1322, 1471, 1480)

Nu Ride Inc. and its affiliated reorganized debtors in the above-captioned proceeding (the "Debtors" or the "Post-Effective Date Debtors") and Cohen Recycling, Inc. ("CRI"), by their respective undersigned counsel, hereby withdraw the Reorganized Debtors' Motion For (A) Entry Of An Order Enforcing The Vehicle Decommission Order And (B) For Related Relief (Docket No. 1314) and CRI's objection to the Motion (Docket No. 1345), subject to the provisions of the Order Granting Motion of Nu Ride Inc. for Approval of Stipulation and Settlement Agreement Between Cohen Recycling, Inc., and Nu Ride Inc., Pursuant to Bankruptcy Rule 9019 (Docket No. 1480) and the Stipulation and Settlement Agreement incorporated therein (Docket No. 1471-3).

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.



Dated: March 6, 2025

MORRIS JAMES LLP

/s/ Tara C. Pakrouh

Eric J. Monzo (DE Bar No. 5214) Tara C. Pakrouh (DE Bar No. 6192) 500 Delaware Avenue, Suite 1500 Wilmington, DE 19801 Telephone: (302) 888-6800 Facsimile: (302) 571-1750 E-mail: emonzo@morrisjames.com tpakrouh@morrisjames.com

-and-

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 bsilverberg@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 msawyer@brownrudnick.com

Counsel to the Post-Effective Date Debtors

Dated: March 6, 2025

HILLER LAW, LLC

/s/ Adam Hiller

Adam Hiller (DE No. 4105) 300 Delaware Avenue, Suite 210, #227 Wilmington, Delaware 19801 (302) 442-7677 telephone ahiller@adamhillerlaw.com

-and-

Jeff Goldstein, Esquire Law Office of Jeffrey D. Goldstein, LLC 9211 Corporate Boulevard, Suite 350 Rockville, Maryland 20850 (301) 838-7047 telephone Jeff@Rockvillelaw.com

Counsel to CRI