

IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:

NU RIDE INC., *et al.*,¹

Reorganized Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: Docket No. 1491

CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING POST-EFFECTIVE DATE DEBTORS' AND CLAIMS OMBUDSMAN'S JOINT TENTH (SUBSTANTIVE) OMNIBUS OBJECTION TO CLAIMS (Reduced Claims, No Liability Claims, Equity Claims, and Withdrawn Claims)

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 March 28, 2025, the Movants filed the *Post-Effective Date Debtors' and Claims Ombudsman's Joint Tenth (Substantive) Omnibus Objection to Claims (Reduced Claims, No Liability Claims, Equity Claims, and Withdrawn Claims)* (the “Objection”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).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 April 28, 2025, at 4:00 p.m. (ET) to respond to the Objection. A hearing on the Objection is scheduled for May 6, 2025, at 11:30 a.m. (ET).

2. The Movants received informal inquiries and responses with respect to the Objection from (i) J. Demetrio Lopez V., (ii) The Timken Company and The Timken Corporation,

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.



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(iii) Laval Tool and Mould LTD., (iv) ANSYS Incorporated and Subsidiaries dba ANSYS Inc., (v) Inteva Products, LLC, (vi) Quality MetalCraft Inc., and (vii) ZF Passive Safety Systems US Inc. The Movants reached a settlement with respect to Claim 1591 filed by The Timken Company and The Timken Corporation and withdraw the Objection with respect to Claim 1591. The Movants have determined to adjourn the hearing with respect to (i) Claim 1087 filed by Laval Tool and Mould LTD, (ii) Claim 1130 filed by ANSYS Incorporated and Subsidiaries dba ANSYS Inc., (iii) Claim 1241 filed by Inteva Products, LLC, (iv) Claim 1289 filed by Quality MetalCraft Inc., and (v) Claim 1291 filed by ZF Passive Safety Systems US Inc. to the next scheduled omnibus hearing date on June 11, 2025, at 10:30 a.m. (ET) (collectively, the “Adjourned Claims”). The parties have agreed that responses to the Objection with respect to the Adjourned Claims are due by May 28, 2025, at 4:00 p.m. (ET).

3. The Movants received no other formal or informal responses with respect to the Objection prior to the objection deadline.

4. Attached hereto as **Exhibit A** is a revised proposed order approving the Objection to remove (i) Claim 1591 to reflect the withdrawal of the Objection with respect thereto and (ii) Claims 1087, 1130, 1241, 1289, and 1291 to reflect the adjournment of the hearing with respect thereto. Attached hereto as **Exhibit B** is a redline of the revised proposed order against the proposed order filed with the Objection.

[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: May 1, 2025
Wilmington, Delaware

/s/ David M. Klauder

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Respectfully submitted,

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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.*,¹

Reorganized Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: Docket No. 1491

**ORDER GRANTING POST-EFFECTIVE DATE DEBTORS' AND
CLAIMS OMBUDSMAN'S JOINT TENTH (SUBSTANTIVE)
OMNIBUS OBJECTION TO CLAIMS
(Reduced Claims, No Liability Claims, Equity Claims, and Withdrawn Claims)**

Upon the *Post-Effective Date Debtors' and Claims Ombudsman's Joint Tenth (Substantive) Omnibus Objection to Claims (Reduced Claims, No Liability Claims, Equity Claims and Withdrawn Claims)* (the "Objection")², 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 reducing the claims set forth on **Schedule 1** and disallowing the claims set forth on **Schedules 1-4** hereto (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 Tenth (Substantive) Omnibus*

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.

² Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Objection.

Objection to Claims (Reduced Claims, No Liability Claims, Equity Claims, & Withdrawn Claims) (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 Schedules 1-4 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 Reduced Claims listed on **Schedule 1** attached hereto are hereby reduced as reflected on the schedule.
4. The No Liability Claims listed on **Schedule 2** attached hereto are hereby disallowed in their entirety.
5. The Equity Claims listed on **Schedule 3** attached hereto are hereby disallowed in their entirety.
6. The Withdrawn Claims listed on **Schedule 4** attached hereto are hereby disallowed in their entirety.
7. The Objection with respect to Claim 1591 filed by The Timken Company and The Timken Corporation has been resolved by settlement entered into between the parties. Accordingly, the Objection with respect to Claim 1591 is withdrawn.
8. The Objection with respect to Claim 1087 filed by Laval Tool and Mould LTD, Claim 1130 filed by ANSYS Incorporated and Subsidiaries dba ANSYS Inc., Claim 1241 filed by Inteva Products, LLC, Claim 1289 filed by Quality MetalCraft Inc., and Claim 1291 filed by ZF Passive Safety Systems US Inc. (collectively, the “**Adjourned Claims**”) is adjourned to the next scheduled omnibus hearing date on June 11, 2025 at 10:30 a.m. (ET). Responses to the Objection with respect to the Adjourned Claims are due by May 28, 2025 at 4:00 p.m. (ET).
9. 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.

10. 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.

11. Nothing in the Objection or this Order shall be construed as an allowance of any Claim.

12. 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.

13. 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.

14. 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.

15. 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.

16. This Order is immediately effective and enforceable.

17. This Court shall retain jurisdiction to hear and determine all matters arising from the interpretation and/or implementation of this Order.

Dated: _____, 2025
Wilmington, Delaware

The Honorable Mary F. Walrath
United States Bankruptcy Judge

Schedule 1 -

Reduced Claims

#	Name of Claimant	Claim Number	Asserted Claim Amount	Asserted Claim Type	Modified Claim Amount	Modified Claim Type	Reason for Disallowance
1	BASF Corporation	19	\$0.00 \$0.00 \$0.00 \$66,696.46	Administrative Priority Secured Priority General Unsecured	\$0.00 \$0.00 \$0.00 \$1,886.00	Administrative Priority Secured Priority General Unsecured	<p>Claim is for goods ordered in alleged reliance on a scheduling forecast issued in connection with schedule agreement purchase orders 109140 and 114283, each of which are subject to a Forecast and Release Policy that limits Debtors' liability to excess materials purchased in reliance on a scheduling forecast no earlier than twelve (12) weeks prior to production. The Debtors' books and records reflect that no more than \$1,886.00 is owed to claimant. Movants are unable to verify any additional amounts owed based on the support provided.</p>

Schedule 2 -

No Liability Claims

#	Name of Claimant	Claim Number	Claim Amount	Claim Type	Reason for Disallowance
1	Federal Insurance Company c/o Chubb	1242	<div> <div>\$0.00</div> <div>\$0.00</div> <div>\$0.00</div> <div>\$37,850.00</div> </div>	<div>Administrative Priority</div> <div>Secured</div> <div>Priority</div> <div>General Unsecured</div>	The liability asserted in the claim was the subject of an audit for which the Debtors were never provided final documentation. The Movants are unable to verify the amounts owed.

Schedule 3 -**Equity Claims**

#	Name of Claimant	Claim Number	Claim Amount	Claim Type	Reason for Disallowance
1	Kamrooz, Massoud	18	\$0.00 \$0.00 \$0.00 \$15,477.36	Administrative Priority Secured Priority General Unsecured	Claim is based on ownership of equity securities in the Debtors.
2	Lopez V., J. Demetrio	778	\$0.00 \$0.00 \$0.00 \$2,839.29	Administrative Priority Secured Priority General Unsecured	Claim is based on ownership of equity securities in the Debtors.

Schedule 4 -

Withdrawn Claims

#	Name of Claimant	Claim Number	Claim Amount	Claim Type	Reason for Disallowance
1	Optessa USA, Inc.	39	\$0.00 \$0.00 \$0.00 \$110,500.00	Administrative Priority Secured Priority General Unsecured	Claim has been withdrawn

Exhibit B

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

In re:

NU RIDE INC., *et al.*,¹

Reorganized Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**ORDER GRANTING POST-EFFECTIVE DATE DEBTORS' AND
CLAIMS OMBUDSMAN'S JOINT TENTH (SUBSTANTIVE)
OMNIBUS OBJECTION TO CLAIMS
(Reduced Claims, No Liability Claims, Equity Claims, and Withdrawn Claims)**

Upon the *Post-Effective Date Debtors' and Claims Ombudsman's Joint Tenth (Substantive) Omnibus Objection to Claims (Reduced Claims, No Liability Claims, Equity Claims and Withdrawn Claims)* (the "Objection")², 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 reducing the claims set forth on **Schedule 1** and disallowing the claims set forth on **Schedules 1-4** hereto (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 Tenth (Substantive) Omnibus*

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.

² Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Objection.

Objection to Claims (Reduced Claims, No Liability Claims, Equity Claims, & Withdrawn Claims) (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 Schedules 1-4 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 Reduced Claims listed on **Schedule 1** attached hereto are hereby reduced as reflected on the schedule.
4. The No Liability Claims listed on **Schedule 2** attached hereto are hereby disallowed in their entirety.
5. The Equity Claims listed on **Schedule 3** attached hereto are hereby disallowed in their entirety.
6. The Withdrawn Claims listed on **Schedule 4** attached hereto are hereby disallowed in their entirety.

7. The Objection with respect to Claim 1591 filed by The Timken Company and The Timken Corporation has been resolved by settlement entered into between the parties. Accordingly, the Objection with respect to Claim 1591 is withdrawn.

8. The Objection with respect to Claim 1087 filed by Laval Tool and Mould LTD, Claim 1130 filed by ANSYS Incorporated and Subsidiaries dba ANSYS Inc., Claim 1241 filed by Inteva Products, LLC, Claim 1289 filed by Quality MetalCraft Inc., and Claim 1291 filed by ZF Passive Safety Systems US Inc. (collectively, the “Adjourned Claims”) is adjourned to the next scheduled omnibus hearing date on June 11, 2025 at 10:30 a.m. (ET). Responses to the Objection with respect to the Adjourned Claims are due by May 28, 2025 at 4:00 p.m. (ET).

7.9. 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.

~~8.~~10. 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.

~~9.~~11. Nothing in the Objection or this Order shall be construed as an allowance of any Claim.

~~10.~~12. 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.

~~11.~~13. 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.

~~12.~~14. 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.

~~13.~~15. 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.

~~14.16.~~ This Order is immediately effective and enforceable.

~~15.17.~~ This Court shall retain jurisdiction to hear and determine all matters arising from the interpretation and/or implementation of this Order.

Dated: _____, 2025
Wilmington, Delaware

The Honorable Mary F. Walrath
United States Bankruptcy Judge

**Schedule 1 –
Reduced Claims**

#	Name of Claimant	Claim Number	Asserted Claim Amount	Asserted Claim Type	Modified Claim Amount	Modified Claim Type	Reason for Disallowance
1	BASF Corporation	19	\$0.00 \$0.00 \$0.00 \$66,696.46	Administrative Priority Secured Priority General Unsecured	\$0.00 \$0.00 \$0.00 \$1,886.00	Administrative Priority Secured Priority General Unsecured	Claim is for goods ordered in alleged reliance on a scheduling forecast issued in connection with schedule agreement purchase orders 109140 and 114283, each of which are subject to a Forecast and Release Policy that limits Debtors' liability to excess materials purchased in reliance on a scheduling forecast no earlier than twelve (12) weeks prior to production. The Debtors' books and records reflect that no more than \$1,886.00 is owed to claimant. Movants are unable to verify any additional amounts owed based on the support provided.
2	Laval Tool and Mould LTD	1087	\$0.00 \$0.00 \$0.00 \$189,977.94	Administrative Priority Secured Priority General Unsecured	\$0.00 \$0.00 \$0.00 \$128,873.60	Administrative Priority Secured Priority General Unsecured	The documentation provided with the claim does not support the liability asserted. The Debtors' books and records reflect that no more than \$128,873.60 is owed to claimant. Movants are unable to verify any additional amounts owed based on the support provided.

**Schedule 1 –
Reduced Claims**

3	ZF Passive Safety Systems US Inc.	1291	\$0.00\$0.00 \$0.00\$751, 642.85	Administrative PrioritySecuredPriorit yGeneral Unsecured	\$0.00\$0.00 \$0.00\$86,4 40.00	Administrative PrioritySecuredPriorit yGeneral Unsecured	The Debtors' books and records support \$286,319.00 owed to claimant on account of unpaid tooling and \$37,477.36 on account of obsolescence. The Debtors are not liable under applicable terms and conditions for amounts asserted on account of sub-supplier costs. The Debtors' records also reflect a credit due to Lordstown in the amount of \$237,387, which is applied to further reduce the amounts owed to claimant. Movants are unable to verify any additional amounts owed based on the support provided.
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**Schedule 2 –
No Liability Claims**

#	Name of Claimant	Claim Number	Claim Amount	Claim Type	Reason for Disallowance
4	ANSYS Incorporated and Subsidiaries dba ANSYS Inc.	1130	<div>\$0.00</div> <div>\$0.00</div> <div>\$0.00</div> <div>\$1,150,000.00</div>	<div>Administrative Priority</div> <div>Secured</div> <div>Priority</div> <div>General Unsecured</div>	The Debtors' books and records, and the supporting documentation provided by claimant, supports the conclusion that the Debtors entered into a one year license with creditor, as opposed to the three year license asserted in the proof of claim. The license fees due for the one year contract were paid in full prepetition. Accordingly, no further amounts are owed to claimant.
31	Federal Insurance Company c/o Chubb	1242	<div>\$0.00</div> <div>\$0.00</div> <div>\$0.00</div> <div>\$37,850.00</div>	<div>Administrative Priority</div> <div>Secured</div> <div>Priority</div> <div>General Unsecured</div>	The liability asserted in the claim was the subject of an audit for which the Debtors were never provided final documentation. The Movants are unable to verify the amounts owed.
4	Inteva Products, LLC	1241	<div>\$0.00</div> <div>\$0.00</div> <div>\$0.00</div> <div>\$603,055.00</div>	<div>Administrative Priority</div> <div>Secured</div> <div>Priority</div> <div>General Unsecured</div>	The Claim does not provide or identify a contract with the Debtors upon which the alleged liability is based and the Debtors' books and records do not reflect any amounts owed to claimant. Accordingly, Movants are unable to verify any amounts owed.

**Schedule 2 –
No Liability Claims**

5	Quality MetalCraft Inc.	1289	<div>\$0.00</div> <div>\$0.00</div> <div>\$0.00</div> <div>\$373,853.44</div>	<div>Administrative Priority</div> <div>Secured</div> <div>Priority</div> <div>General Unsecured</div>	The Terms and Conditions applicable to the spot buy purchase orders on which the claim is based limits the Debtors' damages to goods delivered to the Debtors. The Debtors have no record of receiving the goods in question and claimant has not provided proof of delivery to enable Movants to verify any amounts owed.
6	The Timken Company and The Timken Corporation	1591	<div>\$0.00</div> <div>No Less than</div> <div>\$346,514.00</div> <div>\$0.00</div> <div>\$0.00</div>	<div>Administrative</div> <div>Priority Secured</div> <div>Priority General</div> <div>Unsecured</div>	The damages set forth in the Spot Buy Production Quotation are not supported by a valid contract. Movants disagree that the indemnification language relied upon by claimant supports the collection of the asserted damages.