

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
NU RIDE INC., <i>et al.</i> , ¹	Case No. 23-10831 (MFW)
Reorganized Debtors.	(Jointly Administered)
NU RIDE INC.,	Re: Docket No. 1529
Plaintiff,	
v.	Adv. Pro. No. 25-51053 (MFW)
BARRY L LEONARD AND COMPANY INC.,	Re: Adv Docket No. 1
Defendant.	

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING STIPULATION
FOR BARRY L LEONARD AND COMPANY INC. TO ANSWER (I) COMPLAINT AND
(II) CLAIMS OMBUDSMAN’S OBJECTION TO PROOF OF CLAIM NO. 535 AND
AGREED BRIEFING SCHEDULE**

1. The undersigned counsel hereby certifies as follows:
2. On June 27, 2025, the above-captioned debtors (collectively, the “Debtors” and following the Effective Date of the Plan, the “Post-Effective Date Debtors” or “Plaintiff”), filed the *Complaint* [Adv. D.I. 1] (the “Complaint”) against Defendant Barry L Leonard and Company Inc. (the “Defendant”) in the above-captioned adversary proceeding.
3. On July 9, 2025, Alan D. Halperin, solely in his capacity as claims ombudsman (the “Claims Ombudsman” and, together with the Plaintiff and Defendant, the “Parties”), filed the

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.



Claims Ombudsman's Objection to Proof of Claim No. 535 Filed by Barry L Leonard and Company Inc. [D.I. 1529] (the "Claims Objection").

4. The Parties have conferred on a briefing schedule for the Complaint and the Claims Objection and have memorialized their agreement in the *Stipulation for Barry L Leonard and Company Inc. to Answer (I) Complaint and (II) Claims Ombudsman's Objection to Proof of Claim No. 535 and Agreed Briefing Schedule* (the "Stipulation")².

5. The Parties have prepared a proposed order (the "Proposed Order"), attached hereto as **Exhibit A**, approving the Stipulation. A true and correct copy of the Stipulation is attached as **Exhibit 1** to the Proposed Order. Plaintiff respectfully requests that the Court enter the Proposed Order at its earliest convenience.

Dated: July 18, 2025
Wilmington, Delaware

MORRIS JAMES LLP

/s/ Tara C. Pakrouh

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² Capitalized terms used but not defined herein have the meaning provided in the Stipulation.

EXHIBIT A

Proposed Order

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

<p>In re:</p> <p>NU RIDE INC., <i>et al.</i>,¹</p> <p style="text-align: center;">Reorganized Debtors.</p>	<p>Chapter 11</p> <p>Case No. 23-10831 (MFW)</p> <p>(Jointly Administered)</p>
<p>NU RIDE INC.,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>BARRY L LEONARD AND COMPANY INC.,</p> <p style="text-align: center;">Defendant.</p>	<p>Re: Docket Nos. 1529, ____</p> <p>Adv. Pro. No. 25-51053 (MFW)</p> <p>Re: Adv Docket Nos. 1, ____</p>

**ORDER APPROVING STIPULATION FOR BARRY L LEONARD AND COMPANY
INC. TO ANSWER (I) COMPLAINT AND (II) CLAIMS OMBUDSMAN’S OBJECTION
TO PROOF OF CLAIM NO. 535 AND AGREED BRIEFING SCHEDULE**

Upon the certification of counsel regarding the *Stipulation for Barry L Leonard and Company Inc. to Answer (I) Complaint and (II) Claims Ombudsman’s Objection to Proof of Claim No. 535 and Agreed Briefing Schedule* (the “Stipulation”),² a copy of which is attached hereto as **Exhibit 1**, entered into by and between Plaintiff Nu Ride Inc. (“Plaintiff”), Alan D. Halperin, (the “Claims Ombudsman”), and Defendant Barry L Leonard and Company Inc. (the “Defendant” and, together with Plaintiff and the Claims Ombudsman, the “Parties”); and venue of this Chapter 11 case in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that

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 used but not defined herein have the meaning provided in the Stipulation.

sufficient notice of the Stipulation has been given; and after due deliberation; and good and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Stipulation is hereby APPROVED as set forth herein.
2. The Parties are authorized to enter into the Stipulation, substantially in the form attached hereto as **Exhibit 1**.
3. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order and the Stipulation.

EXHIBIT 1

Stipulation

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

In re:	Chapter 11
NU RIDE INC., <i>et al.</i> , ¹	Case No. 23-10831 (MFW)
Reorganized Debtors.	(Jointly Administered)
NU RIDE INC.,	Re: Docket No. 1529
Plaintiff,	
v.	Adv. Pro. No. 25-51053 (MFW)
BARRY L LEONARD AND COMPANY INC.,	Re: Adv Docket No. 1
Defendant.	

**STIPULATION FOR BARRY L LEONARD AND COMPANY INC. TO ANSWER
(I) COMPLAINT AND (II) CLAIMS OMBUDSMAN’S OBJECTION TO PROOF OF
CLAIM NO. 535 AND AGREED BRIEFING SCHEDULE**

Nu Ride Inc. (the “Plaintiff”), Alan D. Halperin, (the “Claims Ombudsman”), and Defendant Barry L Leonard and Company Inc. (the “Defendant” and, together with Plaintiff and the Claims Ombudsman, the “Parties”); through their respective counsel, enter into this Stipulation to extend time for Defendant to answer the Complaint and respond to the Claims Objection and for an agreed briefing schedule (the “Stipulation”) and hereby stipulate and agree as follows:

WHEREAS, On September 21, 2023, Barry L Leonard and Company Inc., which also does business as TransMachine Technologies, timely filed Claim 535 asserting a general

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unsecured claim in the amount of \$394,447.18 against Debtor Lordstown Motors Corp. for “goods purchased and delivered to Lordstown.” As the basis for the liability asserted therein, Claim 535 references purchase orders 118101, 110981, 118483, and 118484.

WHEREAS, on June 27, 2025, Plaintiff, filed the *Complaint* [Adv. D.I. 1] (the “Complaint”) against the Defendant in the above-captioned adversary proceeding.

WHEREAS, on July 9, 2025, the Claims Ombudsman filed the *Claims Ombudsman’s Objection to Proof of Claim No. 535 Filed by Barry L Leonard and Company Inc.* [D.I. 1529] (the “Claims Objection”).

NOW THEREFORE, to promote the efficient and expeditious disposition of the Adversary Proceeding (as defined below), the Parties agree as follows:

1. The Claims Objection is consolidated for procedural purposes into and shall be administered within Adv. Pro. No. 25-51053 (MFW) (the “Adversary Proceeding”).
2. The Parties agree and stipulate that the time within which Defendant may answer, move, or otherwise plead to both the Complaint and Claims Objection with a single responsive brief is hereby extended to and including August 27, 2025.
3. The Parties agree and stipulate that the time within which Plaintiff and Claims Ombudsman may file their reply brief to Defendant’s responsive brief is hereby extended to and including September 10, 2025.
4. The Parties agree and stipulate that a pre-trial conference date will be scheduled on March 10, 2026, subject to the Court’s availability.
5. The Parties shall meet and confer to discuss the timing and scheduling of an appropriate discovery and a briefing schedule in the Adversary Proceeding thereafter.

6. Any of the aforementioned deadlines may be extended by agreement between the Parties, without the need for further order of the Court.

7. Defendant has accepted service of the Complaint; all rights and arguments with respect to personal jurisdiction are reserved and preserved.

Dated: July 18, 2025

MORRIS JAMES LLP

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