

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. 1528
Plaintiff,	
v.	Adv. Pro. No. 25-51052 (MFW)
AMPHENOL INTERCONNECT PRODUCTS CORPORATION,	Re: Adv Docket No. 1
Defendant.	

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING STIPULATION
FOR AMPHENOL INTERCONNECT PRODUCTS CORPORATION TO ANSWER (I)
COMPLAINT AND (II) CLAIMS OMBUDSMAN’S OBJECTION TO PROOF OF
CLAIM NO. 1140 AND AGREED BRIEFING SCHEDULE**

The undersigned counsel hereby certifies as follows:

1. 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 Amphenol Interconnect Products Corporation (the “Defendant”) in the above-captioned adversary proceeding.

2. 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. 1140 Filed by Amphenol Interconnect Products Corporation. [D.I. 1528] (the "Claims Objection").

3. The Parties have conferred on a briefing schedule for the Complaint and the Claims Objection and have memorialized their agreement in the *Stipulation for Amphenol Interconnect Products Corporation to Answer (I) Complaint and (II) Claims Ombudsman's Objection to Proof of Claim No. 1140 and Agreed Briefing Schedule* (the "Stipulation")².

4. 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: August 14, 2025

MORRIS JAMES LLP

/s/ Tara C. Pakrouh

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Attorneys for Nu Ride, Inc.

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>AMPHENOL INTERCONNECT PRODUCTS CORPORATION,</p> <p style="text-align: center;">Defendant.</p>	<p>Re: Docket Nos. 1528, ____</p> <p>Adv. Pro. No. 25-51053 (MFW)</p> <p>Re: Adv Docket Nos. 1, ____</p>

**ORDER APPROVING STIPULATION FOR AMPHENOL INTERCONNECT
PRODUCTS CORPORATION TO ANSWER (I) COMPLAINT AND (II) CLAIMS
OMBUDSMAN’S OBJECTION TO PROOF OF CLAIM NO. 1140 AND AGREED
BRIEFING SCHEDULE**

Upon the certification of counsel regarding the *Stipulation for Amphenol Interconnect Products Corporation to Answer (I) Complaint and (II) Claims Ombudsman’s Objection to Proof of Claim No. 1140 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 Amphenol Interconnect Products Corporation (the “Defendant” and, together with Plaintiff and the Claims Ombudsman, 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.

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

“Parties”); and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of this Chapter 11 case in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that 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. 1528
Plaintiff,	
v.	Adv. Pro. No. 25-51053 (MFW)
AMPHENOL INTERCONNECT PRODUCTS CORPORATION,	Re: Adv. Docket No. 1
Defendant.	

**STIPULATION FOR AMPHENOL INTERCONNECT PRODUCTS CORPORATION.
TO ANSWER (I) COMPLAINT AND (II) CLAIMS OMBUDSMAN’S OBJECTION TO
PROOF OF CLAIM NO. 1140 AND AGREED BRIEFING SCHEDULE**

Nu Ride Inc. (the “Plaintiff”), Alan D. Halperin, (the “Claims Ombudsman”), and Defendant Amphenol Interconnect Products Corporation (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 respond to the Claims Objection and for an agreed briefing schedule (the “Stipulation”) and hereby stipulate and agree as follows:

WHEREAS, On October 6, 2023, Amphenol Interconnect Products Corporation, timely filed Claim 1140 asserting a general unsecured claim in the amount of \$ 371,520.76 against Debtor

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Lordstown Motors Corp.

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. 1140 Filed by Amphenol Interconnect Products Corporation* [D.I. 1528] (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 into and shall be administered within Adv. Pro. No. 25-51052 (MFW) (the “Adversary Proceeding”).
2. The Parties agree and stipulate that the time which Defendant may answer, move, or otherwise plead to the Claims Objection is hereby extended to and including September 19, 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 October 10, 2025.
4. The Parties agree and stipulate that a pre-trial conference date will be scheduled on April 10, 2026, subject to the Court’s availability.
5. The Parties shall meet and confer to discuss the timing of discovery and case management schedule in the Adversary Proceeding.
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 and filed its Answer; all rights and arguments with respect to personal jurisdiction are reserved and preserved.

Dated: August 14, 2025

MORRIS JAMES LLP

/s/ Tara C. Pakrouh

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