

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 SUPPLEMENTAL ORDER
APPROVING ZF PASSIVE SAFETY US INC.'S GENERAL UNSECURED CLAIM
(CLAIM NO. 1291)**

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Joint Tenth (Substantive) Omnibus Objection to Claims (Reduced Claims, No Liability Claims, Equity Claims, and Withdrawn Claims)* (the “Objection”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).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 was scheduled for May 6, 2025 at 11:30 a.m. (ET).

2. On May 6, 2025, the Court entered the *Order Granting Post-Effective Date Debtors’ and Claims Ombudsman’s Joint Tenth (Substantive) Omnibus Objection to Claims*

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.



2310831251015000000000001

(Reduced Claims, No Liability Claims, Equity Claims, and Withdrawn Claims) [Docket No. 1508]
(the “Tenth Omnibus Order”).

3. The Movants received informal inquiries and responses with respect to the Objection from ZF Passive Safety Systems US Inc. The Movants adjourned the hearing by agreement of the parties so that they could discuss a potential resolution.

4. Following the entry of the Tenth Omnibus Order, the Movants conferred with counsel for ZF Passive Safety Systems US Inc. and entered into a settlement agreement that allows the claim of ZF Passive Safety US Inc. (Claim No. 1291) as a General Unsecured Claim in the amount of \$126,000.00.

5. Attached hereto as **Exhibit A** is a proposed supplemental order approving the General Unsecured Claim of ZF Passive Safety US Inc, (Claim No. 1291) in the amount of \$126,000.00.

[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: October 15, 2025
Wilmington, Delaware

Respectfully submitted,
BIELLI & KLAUDER LLC

/s/ David M. Klauder
David M. Klauder (No. 5769)
1204 N. King Street
Wilmington, DE 19801
Telephone: (302) 803-4600
E-mail: dklauder@bk-legal.com

-and-

HALPERIN BATTAGLIA BENZIJA, LLP
Walter Benzija
Keara M. Waldron
40 Wall Street, 37th Floor
New York, NY 10005
Telephone: (212) 765-9100
Facsimile: (212) 765-0964
E-mail: wbenzija@halperinlaw.net
E-mail: kwaldron@halperinlaw.net

Counsel for the Claims Ombudsman

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

**SUPPLEMENTAL ORDER GRANTING IN PART POST-EFFECTIVE DATE DEBTORS'
AND CLAIMS OMBUDSMAN'S JOINT TENTH (SUBSTANTIVE)
OMNIBUS OBJECTION TO CLAIMS
(REDUCED 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 disallowing the claim of ZF Passive Safety US Inc. (Claim No. 1291) as referenced on **Schedule 1** (the "Claim"), 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 Objection to Claims (Reduced Claims, No Liability Claims, Equity Claims, and Withdrawn Claims)* (the "Halperin Declaration") filed contemporaneously with the Objection and in support thereof; and this Court having jurisdiction

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.

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 based on the Certification of Counsel filed by the Claims Ombudsman reflecting that the Claims Ombudsman has resolved the Objection as it relates to the claim of ZF Passive Safety US Inc.; 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

IT IS THEREFORE ORDERED THAT:

1. The Objection is **GRANTED** as set forth herein.
2. The Claim #1291 is hereby allowed as a general unsecured claim in the amount of \$126,000 as listed on **Schedule 1**.
3. 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.

4. This Order is immediately effective and enforceable.
5. This Court shall retain jurisdiction to hear and determine all matters arising from the interpretation and/or implementation of this Order.

Schedule 1 -

Reduced Claims

#	Name of Claimant	Claim Number	Asserted Claim Amount	Asserted Claim Type	Modified Claim Amount	Modified Claim Type	Reason for Disallowance
3	ZF Passive Safety Systems US Inc.	1291	\$0.00 \$0.00 \$0.00 \$751,642.85	Administrative Priority Secured Priority General Unsecured	\$0.00 \$0.00 \$0.00 \$126,000.00	Administrative Priority Secured Priority General Unsecured	As settled by the parties, the Claim Ombudsman agrees to a general unsecured claim in the amount of \$126,000.00.