

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:  NU RIDE INC., <i>et al.</i> , <sup>1</sup>  Reorganized Debtors.	Chapter 11  Case No. 23-10831 (MFW)  (Jointly Administered)  Re: Docket No. 1588
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**CERTIFICATION OF COUNSEL REGARDING POST-EFFECTIVE DATE DEBTORS'  
MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING THE REDUCTION  
OF THE GUC RESERVE AND (II) GRANTING RELATED RELIEF**

The undersigned counsel hereby certifies as follows:

1. On October 30, 2025, Nu Ride Inc. and its affiliated reorganized debtors in the above-captioned proceeding (the “Post-Effective Date Debtors”), by and through undersigned counsel, filed the *Post-Effective Date Debtors’ Motion for Entry of an Order (I) Authorizing the Reduction of the GUC Reserve and (II) Granting Related Relief* [Docket No. 1588] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

2. The deadline to respond to the Motion was November 6, 2025 at 4:00 p.m. (ET) (the “Objection Deadline”).

3. On November 6, 2025, Darren Post, Steve Burns, Julio Rodriguez, and Caimin Flannery (together, the “Claimants”) filed the *Objection of Darren Post, Steve Burns, Julio Rodriguez, and Caimin Flannery to Post-Effective Date Debtors’ Motion for Entry of an Order (I) Authorizing the Reduction of the GUC Reserve and (II) Granting Related Relief* [Docket No. 1592] (the “Objection”).

4. On November 7, 2025, the Post-Effective Date Debtors filed the *Reply in Support*

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<sup>1</sup> 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 Alex Matina, CEO, M 3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

*of Post-Effective Date Debtors’ Motion for Entry of an Order (I) Authorizing the Reduction of the GUC Reserve and (II) Granting Related Relief* [Docket No. 1593] with the Court.

5. A hearing on the Motion and Objection was held on November 13, 2025 (the “Hearing”).

6. As instructed by the Court at the Hearing, the Post-Effective Date Debtors revised the proposed form of order (the “Proposed Order”) attached to the Motion.

7. Attached hereto as **Exhibit A** is a revised proposed order (the “Revised Proposed Order”) incorporating the Court’s ruling. A redline comparing the Revised Proposed Order to the Proposed Order is attached hereto as **Exhibit B**. The Claimants do not object to entry of the Revised Proposed Order.

8. The Post-Effective Date Debtors respectfully request that the Court enter the Revised Proposed Order granting the Motion at its earliest convenience.

*[Remainder of Page Intentionally Left Blank]*

Dated: November 14, 2025  
Wilmington, Delaware

**MORRIS JAMES LLP**

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**EXHIBIT A**

Revised Proposed Order

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

In re:

NU RIDE INC., *et al.*,<sup>1</sup>

Reorganized Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Re: Docket No. 1588**

**ORDER (I) AUTHORIZING THE REDUCTION  
OF THE GUC RESERVE AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)<sup>2</sup> of the Post-Effective Date Debtors, for the entry of an order (this “Order”) authorizing the reduction of the GUC Reserve, the objection [D.I. 1592] and reply [D.I. 1593] filed in response to the same, and the hearing held on November 13, 2025, at which the Court heard argument; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; venue being proper before this Court; consideration of the Motion and the relief requested being a core proceeding pursuant to 28 U.S.C. § 157(b); due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; the Court having found and determined that the relief sought in the Motion is in the best interests of the Post-Effective Date Debtors’ estate, its creditors and all parties in interest, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

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<sup>1</sup> 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 Alex Matina, CEO, M 3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

<sup>2</sup> Capitalized terms used, but not otherwise defined herein, shall have the meanings ascribed to such terms in the Motion.

1. That the Motion is GRANTED as set forth herein.
2. The Post-Effective Date Debtors are hereby authorized to reduce the GUC Reserve to \$5.1 million.
3. The Claims Ombudsman and all creditors may file a motion to request an increase in the GUC Reserve to the extent there is a change in circumstances. The Post-Effective Date Debtors reserve all rights with respect to any such motion.
4. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

**EXHIBIT B**

Redline

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

In re:

NU RIDE INC., *et al.*,<sup>1</sup>

Reorganized Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Re: Docket No. 1588

**ORDER (I) AUTHORIZING THE REDUCTION  
OF THE GUC RESERVE AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)<sup>2</sup> of the Post-Effective Date Debtors, for the entry of an order (this “Order”) authorizing the reduction of the GUC Reserve, [the objection \[D.I. 1592\]](#) and [reply \[D.I. 1593\] filed in response to the same, and the hearing held on November 13, 2025, at which the Court heard argument](#); and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; venue being proper before this Court; consideration of the Motion and the relief requested being a core proceeding pursuant to 28 U.S.C. § 157(b); due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; the Court having found and determined that the relief sought in the Motion is in the best interests of the Post-Effective Date Debtors’ estate, its creditors and all parties in interest, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

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<sup>1</sup> 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 Alex Matina, CEO, M 3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

<sup>2</sup> Capitalized terms used, but not otherwise defined herein, shall have the meanings ascribed to such terms in the Motion.



1. That the Motion is GRANTED as set forth herein.
2. The Post-Effective Date Debtors are hereby authorized to reduce the GUC Reserve to ~~\$3.5~~5.1 million.
3. The Claims Ombudsman and all creditors may file a motion to request an increase in the GUC Reserve to the extent there is a change in circumstances. The Post-Effective Date Debtors reserve all rights with respect to any such motion.
4. ~~3.~~ This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.