

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b>	
<p>John W. Weiss Leah M. Eisenberg David E. Sklar <b>PASHMAN STEIN WALDER HAYDEN, P.C.</b> 21 Main Street, Suite 200 Hackensack, New Jersey 07601 Telephone: (201) 270-5477 Email: jweiss@pashmanstein.com leisenberg@pashmanstein.com dsklar@pashmanstein.com</p> <p>-and-</p> <p>Joaquin M. C de Baca (<i>admitted pro hac vice</i>) Richard A. Stieglitz (<i>admitted pro hac vice</i>) Youmi Kim (<i>admitted pro hac vice</i>) <b>MAYER BROWN LLP</b> 1221 Avenue of the Americas New York, NY 10020-1001 Telephone: (212) 506-2500 Email: jcdebaca@mayerbrown.com rstieglitz@mayerbrown.com ykim@mayerbrown.com</p> <p><i>Counsel for (1) Leeward Renewable Energy, LLC, on behalf of Rabbitbrush Solar, LLC, Chaparral Springs, LLC, and Antelope Valley BESS, LLC, (2) Longroad Development Company, LLC, on behalf of Serrano Solar, LLC, Sun Streams PVS, LLC, and Sun Streams Expansion, LLC, (3) DTE Electric Company; and (4) Poblano Energy Storage, LLC</i></p>	
<p>In Re:</p> <p>POWIN, LLC, <i>et al.</i>,<sup>1</sup></p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case Number: 25-16137 (MBK)</p> <p>Jointly Administered</p>

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: (i) Powin Project LLC [1583], (ii) Powin, LLC [0504], (iii) PEOS Holdings, LLC [5476], (iv) Powin China Holdings 1, LLC [1422], (v) Powin China Holdings 2, LLC [9713], (vi) Charger Holdings, LLC [5241], (vii) Powin Energy Ontario Storage, LLC [8348], (viii) Powin Energy Operating Holdings, LLC [2495], (ix) Powin Energy Operating, LLC [6487]. The Debtors’ mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.



**VERIFIED STATEMENT PURSUANT TO RULE 2019 OF THE  
FEDERAL RULES OF BANKRUPTCY PROCEDURE**

In connection with the Chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors and debtors in possession (collectively, the “Debtors”), pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Mayer Brown LLP (“Mayer Brown”) and Pashman Stein Walder Hayden, P.C. (“Pashman Stein” and together with Mayer Brown, “Counsel”) hereby make the following verified statement (this “Statement”) with respect to Counsel’s representation of certain creditors and/or parties-in-interest in these Chapter 11 Cases by virtue of certain intellectual property licenses that were granted to them by the Debtors (the “Licensees”). In support of the Statement, Counsel respectfully states as follows:

1. The name and address of each of the Licensees represented by Counsel are as follows:

	<u>Name</u>	<u>Address</u>
a.	Leeward Renewable Energy, LLC, on behalf of:  Antelope Valley BESS, LLC Chaparral Springs, LLC Rabbitbrush Solar, LLC	6688 N. Central Expressway Suite 500 Dallas, TX 75206
b.	Longroad Development Company, LLC, <sup>2</sup> on behalf of:  Serrano Solar, LLC Sun Streams PVS, LLC Sun Streams Expansion, LLC	125 High Street High Street Tower Suite 1705 Boston, MA 02110
c.	DTE Electric Company	One Energy Plaza 1500 WCB Detroit, MI 48226

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<sup>2</sup> All prior references to “Longroad Energy Holdings, LLC” or “Longroad Energy Partners” in earlier filings in these Chapter 11 Cases shall be deemed to refer to “Longroad Development Company, LLC.”

d.	Poblano Energy Storage, LLC <sup>3</sup>	c/o Strata Solar, LLC 800 Taylor St. Suite 200 Durham, NC 27701
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2. The nature and amount of disclosable economic interests held in relation to the Debtors are as follows: as of the date of this Statement, the Licensees hold claims, including unsecured pre-petition claims and potentially other claims, including for potential rejection damages in the event their license or other agreements are rejected. The full amount of each of the Licensees' claims is undetermined at this time. The foregoing information is based upon information provided by the Licensees to Counsel and is subject to change.

3. Each Counsel is engaged by each of the Licensees individually pursuant to engagement letters. Copies of such engagement letters are not attached hereto as they are protected by the attorney-client privilege. If Counsel undertakes an additional representation of other clients in these Chapter 11 Cases, this Statement will be supplemented in accordance with Bankruptcy Rule 2019.

4. Upon information and belief formed after due inquiry, Counsel has no prepetition claims against or equity interest in the Debtors.

5. Upon information and belief formed after due inquiry, Counsel does not currently represent or purport to represent any other parties in these Chapter 11 Cases. In addition, Counsel does not represent the Licensees as a "committee" (as such term is used in the Bankruptcy Code and Bankruptcy Rules) and does not undertake to represent the interests of, and is not a fiduciary

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<sup>3</sup> Poblano Energy Storage, LLC engaged Counsel after the commencement of these Chapter 11 Cases and, as of the date of this Statement, Counsel has not filed any pleading on behalf of Poblano Energy Storage.

for, any other creditor, party in interest, or other entity that has not signed an engagement letter with Counsel. In addition, the Licensees do not represent or purport to represent any other entities in connection with these Chapter 11 Cases. Each of the Licensees do not represent the interests of, nor act as a fiduciary for, any person or entity other than itself in connection with the Chapter 11 Cases. While certain of the Licensees have been joint signatories to certain filings in these Chapter 11 Cases where they believe they have similar interests, they are not, at this time, generally acting as a formal *ad hoc* group or “committee” (as such term is used in the Bankruptcy Code and Bankruptcy Rules).

6. Nothing contained in this Statement should be construed as (i) a waiver or release of any claims against or equity interests in the Debtors; (ii) a waiver or release of any rights, actions, defenses, setoffs or recoupments to which any of the Licensees may be entitled, in law or in equity, pursuant to applicable law or under any agreement or otherwise, with all such rights, actions, defenses, setoffs or recoupments being expressly reserved in all respects; (iii) an admission with respect to any fact or legal theory; (iv) a waiver or release of the rights of any of the Licensees to have any final order entered by, or other exercise of the judicial power of the United States performed by an Article III court; (v) a waiver or release of the rights of any of the Licensees to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Judge; (vi) consent to the jurisdiction of the Court over any matter; (vii) an election of remedies; (viii) a waiver or release of any rights of any of the Licensees may have to a jury trial; or (ix) a waiver or release of the right to move to withdraw the reference with respect to any matter or proceeding that may be commenced in these Chapter 11 cases against or otherwise involving any of the Licensees. Nothing herein should be construed as a limitation upon, or waiver of, any rights of any Licensee to assert, file, and/or amend any proof of claim in accordance with

applicable law and any orders entered in these cases establishing procedures for filing proofs of claim or interests.

7. The undersigned verifies that the foregoing is true and correct to the best of their knowledge.

8. The Licensees, through their Counsel, reserve the right to amend or supplement this Statement in accordance with the requirements set forth in Bankruptcy Rule 2019.

9. The information contained herein is intended only to comply with Bankruptcy Rule 2019 and is not intended for any other use or purpose.

*[Remainder of page intentionally left blank]*

Dated: July 3, 2025  
Hackensack, NJ

Respectfully submitted,

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