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*Proposed Counsel for Debtors and
Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:
Powin, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-16137 (MBK)

(Jointly Administered)

**AMENDED NOTICE OF AGENDA OF MATTERS SCHEDULED
TO BE HEARD ON JULY 15, 2025 AT 11:30 A.M. (ET)**

¹ 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], and (ix) Powin Energy Operating, LLC [6487]. The Debtors' mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.



Date and Time: July 15, 2025, at 11:30 A.M. (Prevailing Eastern Time)

Location of Hearing: United States Bankruptcy Court
District of New Jersey
402 East State Street
Trenton, NJ 08608
Courtroom #8

PLEASE TAKE NOTICE that the matters below are currently scheduled to be heard on July 15, 2025, at 11:30 a.m. (prevailing Eastern Time), before the Honorable Judge Michael B. Kaplan. The Hearing will be conducted **IN PERSON**. Parties wishing to present argument must be present in the Courtroom. Counsel who do not intend to argue but who wish to observe; or Counsel who do not intend to argue but wish to have speaking capabilities, if necessary, to preserve their rights; or Counsel with unavoidable conflicts or extenuating circumstances, may request to appear remotely by sending an email to Chambers (chambers_of_mbk@njb.uscourts.gov) indicating the name of the person appearing, their e-mail address, their affiliation, and whom they represent/interest in this case. If the request is approved, the participant will receive appropriate credentials and further instruction.

PLEASE TAKE FURTHER NOTICE that Telephonic information for observational purposes can be found the page on the Court's website devoted to the Powin, LLC case: <https://njb-admin.jdc.ao.dcn/powin>.

The matters set for hearing are divided into the following categories for the purposes of this Agenda:

- I. SECOND DAY MATTERS**
- II. UNCONTESTED MATTERS**
- III. CONTESTED MATTERS**
- IV. ADJOURNED MATTERS**

I. SECOND DAY MATTERS:

1. *Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Pay Employee Obligations and (B) Continue Employee Benefit Programs, and (II) Granting Related Relief* [ECF No. 7]. (**“Wage Motion”**)

Response Deadline: July 1, 2025, at 4:00 P.M.

Responses/Replies Received: None.

Related Documents:

- a. *Declaration of Gerard Uzzi in Support of Emergency First Day Motions of the Debtors* [ECF No. 13].

- b. *Certificate of Mailing filed by Kurtzman, Carson Consultants, LLC dba Verita Global* [ECF No. 35].
- c. *Interim Order Granting Motion of the Debtors for Entry of an Order Authorizing Debtors to (A) Pay Employee Obligations and (B) Continue Employee Benefit Programs, and (II) Granting Related Relief* [ECF No. 63].
- d. *Notice of Adjournment of July 8, 2025, Hearing with Respect to Final Orders on Certain First Day Motions ("Second Day Hearing")* [ECF No. 175].
- e. *Certificate of Mailing* [ECF No. 252].
- f. *Notice of Adjournment/Rescheduling by the Court* [ECF No. 253].
- g. *Certificate of No Objection* [ECF No. 377].

Status: This matter is going forward on a final basis.

- 2. *Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain and Renew, Amend, Supplement, Extend, or Modify Insurance Programs and Pay Obligations thereunder; and (II) Granting Related Relief* [ECF No. 8]. (**"Insurance Motion"**)

Response Deadline: July 1, 2025, at 4:00 P.M.

Responses/Replies Received: None.

Related Documents:

- a. *Declaration of Gerard Uzzi in Support of Emergency First Day Motions of the Debtors* [ECF No. 13].
- b. *Certificate of Mailing filed by Kurtzman, Carson Consultants, LLC dba Verita Global* [ECF No. 35].
- c. *Interim Order Granting Motion of the Debtors for Entry of an Order (I) Authorizing the Debtors to Maintain and Renew Insurance Programs and Pay Obligations Thereunder; and (II) Granting Related Relief* [ECF No. 61].
- d. *Notice of Adjournment of July 8, 2025, Hearing with Respect to Final Orders on Certain First Day Motions ("Second Day Hearing")* [ECF No. 175].
- e. *Certificate of Mailing* [ECF No. 252].
- f. *Notice of Adjournment/Rescheduling by the Court* [ECF No. 253].

g. *Certificate of No Objection* [ECF No. 378].

Status: This matter is going forward on a final basis.

3. *Motion of the Debtors for Entry of Interim and Final Orders: (I) Authorizing Use of Cash Management Procedures, Bank Accounts, and Existing Business Forms; (II) Prohibiting Setoffs and Freezing of Bank Accounts; (III) Modifying Requirements of Section 345(b) of the Bankruptcy Code; and (IV) for Related Relief* [ECF No. 12].
(“Cash Management”).

Response Deadline: July 1, 2025, at 4:00 P.M.

Responses/Replies Received: None.

Related Documents:

- a. *Declaration of Gerard Uzzi in Support of Emergency First Day Motions of the Debtors* [ECF No. 13].
- b. *Certificate of Mailing filed by Kurtzman, Carson Consultants, LLC dba Verita Global* [ECF No. 35].
- c. *Interim Order: (I) Authorizing Use of Cash Management Procedures, Bank Accounts, and Existing Business Forms; (II) Prohibiting Setoffs and Freezing of Bank Accounts; III) Modifying Requirements of Section 345(B) of The Bankruptcy Code; and (IV) for Related Relief* [ECF No. 60].
- d. *Notice of Adjournment of July 8, 2025, Hearing with Respect to Final Orders on Certain First Day Motions ("Second Day Hearing")* [ECF No. 175].
- e. *Certificate of Mailing* [ECF No. 252].
- f. *Notice of Adjournment/Rescheduling by the Court* [ECF No. 253].
- g. *Certificate of No Objection* [ECF No. 380].

Status: This matter is going forward on a final basis.

4. *Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) File A Consolidated List of the Debtors' Fifty Largest Unsecured Creditors, (B) File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, (C) Redact Certain Personally Identifiable Information of Natural Persons, and (II) Granting Related Relief* [ECF No. 14].
(“Consolidated Creditor Motion”).

Response Deadline: July 1, 2025, at 4:00 P.M.

Responses/Replies Received: None.

Related Documents:

- a. *Declaration of Gerard Uzzi in Support of Emergency First Day Motions of the Debtors* [ECF No. 13].
- b. *Certificate of Mailing filed by Kurtzman, Carson Consultants, LLC dba Verita Global* [ECF No. 35].
- c. *Interim Order Granting Motion of the Debtors For Entry of an Order (I) Authorizing the Debtors to (A) File a Consolidated List of the Debtors' Fifty Largest Unsecured Creditors, (B) File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, (C) Redact Certain Personally Identifiable Information of Natural Persons, and (II) Granting Related Relief* [ECF No. 64].
- d. *Notice of Adjournment of July 8, 2025 Hearing with Respect to Final Orders on Certain First Day Motions ("Second Day Hearing")* [ECF No. 175].
- e. *Certificate of Mailing* [ECF No. 252].
- f. *Notice of Adjournment/Rescheduling by the Court* [ECF No. 253].
- g. *Certificate of No Objection* [ECF No. 381].

Status: This matter is going forward on a final basis.

II. **UNCONTESTED MATTERS:**

- 5. *Motion of the Debtors Pursuant To 11 U.S.C. §§ 105(A) and 366 and Fed. R. Bankr. P. 6003 and 6004 for Entry of an Order (I) Approving Debtors Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief* [ECF No. 112]. (**"Utilities Motion"**)

Response Deadline: July 8, 2025, at 4:00 P.M.

Responses/Replies Received: None.

Related Documents:

- a. *Certificate of Mailing* [ECF No. 144].

- b. *Notice of Adjournment of July 8, 2025 Hearing with Respect to Final Orders on Certain First Day Motions* (“Second Day Hearing”) [ECF No. 175].

Status: This matter is going forward.

6. *Motion of the Debtors for Entry of an Interim and Final Order (I) Granting Authority to Pay Certain Prepetition Taxes; and (II) Granting Related Relief* [ECF No. 99]. (**“Tax Motion”**).

Response Deadline: July 8, 2025, at 4:00 P.M.

Responses/Replies Received: None.

Related Documents:

- a. *Notice of Hearing of Motion of the Debtors for Entry of an Interim and Final Order (I) Granting Authority to Pay Certain Prepetition Taxes; and (II) Granting Related Relief* [ECF No. 100].
- b. *Certificate of Mailing* [ECF No. 144].
- c. *Notice of Adjournment of July 8, 2025 Hearing with Respect to Final Orders on Certain First Day Motions* (“Second Day Hearing”) [ECF No. 175].
- d. *Certificate of Mailing* [ECF No. 252].
- e. *Notice of Adjournment/Rescheduling by the Court* [ECF No. 253].

Status: This matter is going forward.

III. **CONTESTED MATTERS:**

7. *Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing PostPetition Use of Cash Collateral, (II) Granting Adequate Protection to the Prepetition Secured Parties, (III) Scheduling A Final Hearing, and (IV) Granting Related Relief* [ECF No. 11]. (**“Cash Collateral”**)

Response Deadline: July 1, 2025, at 4:00 P.M.

Responses/Replies Received:

- a. *Limited Objection and Reservation of Rights of Licensees to Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral, (II) Granting Adequate Protection to the Prepetition Secured Parties, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief* filed by DTE Electric Company, Longroad Energy Partners, on behalf of Serrano

Solar, LLC, Sun Streams PVS, LLC, and Sun Streams Expansion, LLC, Leeward Renewable Energy, LLC, on behalf of Rabbitbrush Solar, LLC, Chaparral Springs, LLC, and Antelope Valley BESS, LLC. [ECF No. 38].

- b. *Limited Objection of Applied Surety Underwriters, SiriusPoint America Insurance Company and Pennsylvania Insurance Company to Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Postpetition Use of Cash Collateral, (II) Granting Adequate Protection to the Prepetition Secured Parties, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief* [ECF No. 47].
- c. *Limited Objection of Yuma Solar Energy LLC to Debtors Omnibus Motion for Entry of Order (i) Authorizing the Rejection of Legacy Customer Contracts And (ii) Granting Related Relief and Final Orders Authorizing Use of Cash Collateral and Approving Terms of Post-Petition Financing* [ECF No. 287].

Related Documents:

- a. *Declaration of Gerard Uzzi in Support of Emergency First Day Motions of the Debtors* [ECF No. 13].
- b. *Certificate of Mailing filed by Kurtzman, Carson Consultants, LLC dba Verita Global* [ECF No. 35].
- c. *Interim Order (I) Authorizing Postpetition Use of Cash Collateral, (II) Granting Adequate Protection to the Prepetition Secured Parties, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief* [ECF No. 68].
- d. *Notice of Adjournment of July 8, 2025, Hearing with Respect to Final Orders on Certain First Day Motions ("Second Day Hearing")* [ECF No. 175].
- e. *Certificate of Mailing* [ECF No. 252].
- f. *Notice of Adjournment/Rescheduling by the Court* [ECF No. 253].
- g. *Notice of Filing of (I) Proposed Final Cash Collateral Order, (II) Proposed Final DIP Order, and (III) DIP Credit Agreement* [ECF No. 367].

Status: This matter is going forward on a final basis. The Debtors have incorporated into the proposed order all formal and informal comments received as of the filing date of this Agenda.

- 8. *Motion of the Debtors for Entry of Interim and Final Orders: (I) Authorizing the Debtors to Obtain Postpetition Operational Cash Flow Financing; (II) Granting Liens and Providing Superpriority Administrative Expense Claims; (III) Modifying*

the Automatic Stay; (IV) Scheduling a Final DIP Hearing; and (V) Granting Related Relief [ECF No. 120]. (“**DIP Motion**”)

Response Deadline: July 1, 2025, at 4:00 P.M.

Responses/Replies Received:

- a. *Limited Objection on behalf of Applied Surety Underwriters, Pennsylvania Insurance Company, SiriusPoint America Insurance Company* [ECF No. 140].

Related Documents:

- a. *Notice of Hearing* [ECF No. 121].
- b. *Order Shortening Time for Notice, Setting Hearing* [ECF No. 127].
- c. *Notice of Amended Motion of the Debtors for Entry of Interim and Final Orders: (I) Authorizing the Debtors to Obtain Postpetition Operational Cash Flow Financing; (II) Granting Liens and Providing Superpriority Administrative Expense Claims; (III) Modifying the Automatic Stay; (IV) Scheduling a Final DIP Hearing; and (V) Granting Related Relief* [ECF No. 143].
- d. *Certificate of Mailing* [ECF No. 148].
- e. *Interim Order (I) Authorizing the Debtors to Obtain Postpetition Operational Cash Flow Financing; (II) Granting Liens and Providing Superpriority Administrative Expense Claims; (III) Modifying the Automatic Stay; (IV) Scheduling a Final Dip Hearing; and (V) Granting Related Relief* [ECF No. 169].
- f. *Notice of Amended DIP Financing Milestone and Bidding Procedures Calendar* [ECF No. 186].
- g. *Notice of Filing of (I) Proposed Final Cash Collateral Order, (II) Proposed Final DIP Order, and (III) DIP Credit Agreement* [ECF No. 367].

Status: This matter is going forward. The Debtors have incorporated into the proposed order all formal and informal comments received as of the filing date of this Agenda.

- 9. *Motion for an Order Confirming Automatic Stay is Not in Effect on behalf of Mainfreight Inc.* [ECF No. 180]. (“**Mainfreight Motion**”)

Response Deadline: July 8, 2025, at 4:00 P.M.

Responses/Replies Received:

- a. *Limited Objection on behalf of Ace Engineering* [ECF No. 282].

- b. *Objection of BHER Ravenswood Solar 1, LLC to Mainfreight Inc.'s Motion to Confirm that the Automatic Stay* [ECF No. 286].
- c. *Debtors' Objection to Mainfreight Inc.'s Motion to Confirm that the Automatic Stay Pursuant to 11 U.S.C. § 362(A) Does Not Apply to Certain Goods in its Possession* [ECF No. 294].
- d. *Mainfreight's Omnibus Reply to Motion for an Order Confirming Automatic Stay is Not in Effect Filed on behalf of Mainfreight Inc.* [ECF No. 341].
- e. *Joinder of the Official Committee of Unsecured Creditors of Powin, LLC, et al. to the Debtors' Objection to Mainfreight Inc.'s Motion to Confirm that the Automatic Stay Pursuant to 11 U.S.C. § 362(a) Does Not Apply to Certain Goods in its Possession* [ECF No. 379].

Related Documents:

- a. *Application to Shorten Time* [ECF No. 181].
- b. *Order Granting Application to Shorten Time* [ECF No. 205].
- c. *Notice of Hearing* [ECF No. 212].
- d. *Mainfreight Inc's Witness and Exhibit List* [ECF No. 328].
- e. *BHER Ravenswood Solar 1, LLC Witness and Exhibit List* [ECF No. 375].

Status: This matter is going forward.

- 10. *Motion of The Debtors For Entry of an Order (I) Designating a Stalking Horse Bidder and Approving Stalking Horse Bidder Protections (II) Approving Bidding Procedures By Which Interested Parties May Bid and an Auction Sale Format In Connection With The Sale of Substantially all of The Debtors Assets, (III) Approving Form of Asset Purchase Agreement, (IV) Approving Form of Notice To Be Provided To Interested Parties, (V) Authorizing The Assumption and Assignment of Assumed Contracts and Notice Procedures Thereto, (VI) Scheduling a Court Hearing To Consider Approval of The Sale To The Highest and Best Bidder, and (VII) Authorizing The Sale of Debtors Property Free and Clear of All Causes of Action and Claims* [ECF No. 228]. (**"Bid Procedures Motion"**)

Response Deadline: July 8, 2025, at 4:00 P.M.

Responses/Replies Received:

- a. *Limited Objection and Reservation of Rights of Motion of the Debtors for Entry of an Order (I) Designating a Stalking Horse Bidder and Approving Stalking Horse Bidder Protections filed on behalf of Mainfreight Inc.* [ECF No. 342].
- b. *Ad Hoc Customer Group's Limited Objection and Reservation of Rights to Motion of the Debtors for Entry of an Order (I) Designating a Stalking Horse Bidder and Approving Stalking Horse Bidder Protections (II) Approving Bidding Procedures by Which Interested Parties May Bid and an Auction Sale Format in Connection with the Sale of Substantially All of the Debtors' Assets, (III) Approving Form of Asset Purchase Agreement, (IV) Approving Form of Notice to be Provided to Interested Parties, (V) Authorizing the Assumption and Assignment of Assumed Contracts and Notice Procedures Thereto, (VI) Scheduling a Court Hearing to Consider Approval of the Sale to the Highest and Best Bidder, and (VII) Authorizing the Sale of Debtors' Property Free and Clear of All Causes of Action and Claims* [ECF No. 350].
- c. *Objection to the Motion filed on behalf of U.S. Trustee* [ECF No. 369].
- d. *Second Supplemental Joinder of Honeywell International Inc. to Ad Hoc Customer Group's Limited Objection and Reservation of Rights* [ECF No. 376].

Related Documents:

- a. *Declaration of Mitchener Turnipseed in Support* [ECF No. 229].
- b. *Application to Shorten Time* [ECF No. 238].
- c. *Order Granting Application to Shorten Time* [ECF No. 247].
- d. *Notice of Filing of Stalking Horse APA, Amended Order Approving Bidding Procedures Order, and Amended Bidding Procedures* [ECF No. 271].
- e. *Certificate of Mailing* [ECF No. 312].
- f. *Notice of Deadline to Assert Liens in Connection with Bidding Procedures and Upcoming Sale and Auction* [ECF No. 318].
- g. *Notice of Filing Amended Order Approving Bidding Procedures and Amended Bidding Procedures* [ECF No. 364].

Status: This matter is going forward, and the Debtors intend to present evidence and argument in response to the objections filed by the Office of the United States Trustee and in support of the Bid Procedures Motion.

IV. **ADJOURNED MATTERS:**

11. *Motion for Adequate Protection Filed on behalf of Ad Hoc Customer Group* [ECF No. 297]. (**“Ad Hoc Group Motion”**)

Response Deadline: July 15, 2025, at the hearing.

Responses/Replies Received:

- a. *Declaration of Tyler Hansen in Support of Emergency Motion of Ad Hoc Customer Group for Entry of an Order (I) Granting Adequate Protection Under Section 363(e) of the Bankruptcy Code and (II) Granting Related Relief* [ECF No. 346].

Related Documents:

- a. *Application to Shorten Time* [ECF No. 299].
- b. *Order Granting Application to Shorten Time* [ECF No. 306].
- c. *Motion for Entry of an Order Authorizing Ad Hoc Customer Group to Redact and File Under Seal Confidential Information Contained in Exhibits in Connection with Ad Hoc Customer Group's Declarations and Witness and Exhibit List* [ECF No. 339].
- d. *Declaration of Ann Walter in Support of Emergency Motion of Ad Hoc Customer Group* [ECF No. 343].
- e. *Order Granting Application to Shorten Time* [ECF No. 344].

Status: This matter has been adjourned to August 6, 2025.

12. *Omnibus Motion of the Debtors for Entry of an Order (I) Authorizing the Rejection of Legacy Customer Contracts and (II) Granting Related Relief* [ECF No. 88]. (**“Rejection Motion”**)

Response Deadline: July 8, 2025, at 4:00 P.M.

Responses/Replies Received:

- a. *Response by Kyriaki Christodoulou on behalf of Arevon Energy, Inc* [ECF No. 281].
- b. *Limited Objection of Yuma Solar Energy LLC to Debtors Omnibus Motion for Entry of Order (i) Authorizing the Rejection of Legacy Customer Contracts And*

- (ii) Granting Related Relief and Final Orders Authorizing Use of Cash Collateral and Approving Terms of Post-Petition Financing* [ECF No. 287].
- c. *Limited Objection to Motion to Reject filed by Mitsubishi Power Americas, Inc., Prevalon Energy LLC* [ECF No. 288].
 - d. *Response on behalf of Apex Clean Energy Holdings, LLC* [ECF No. 291].
 - e. *Joinder of Honeywell International Inc* [ECF No. 292].
 - f. *Limited Objection to Omnibus Motion of the Debtors for Entry of an Order (I) Authorizing the Rejection of Legacy Customer Contracts and (II) Granting Related Relief on behalf of KCE NY 3, LLC, KCE TX 2, LLC, KCE TX 7, LLC, KCE TX 8, LLC, Key Capture Energy, LLC* [ECF No. 293].
 - g. *Limited Objection to and Reservation of Rights Regarding Omnibus Motion of the Debtors for Entry of an Order (I) Authorizing the Rejection of Legacy Customer Contracts and (II) Granting Related Relief* [ECF No. 295].
 - h. *Limited Objection and Reservation of Rights of Ad Hoc Customer* [ECF No. 296].
 - i. *Limited Objection to and Reservation of Rights on behalf of EsVolta, L.P.* [ECF No. 300].
 - j. *Objection of Licensees to Omnibus Motion of the Debtors for Entry of an Order (I) Authorizing the Rejection of Legacy Customer Contracts and (II) Granting Related Relief on behalf of Rabbitbrush Solar, LLC, Chaparral Springs, LLC, and Antelope Valley BESS, LLC, Longroad Development Company, LLC, on behalf of Serrano Solar, LLC, Sun Streams PVS, LLC, and Sun Streams Expansion, LLC* [Docket No. 323].
 - k. *Declaration of Dustin Wambeke in Support of Objection of Licensees to Omnibus Motion of the Debtors for Entry of an Order (I) Authorizing the Rejection of Legacy Customer Contracts and (II) Granting Related Relief* [ECF No. 324].
 - l. *Declaration of Fred Ihimodu in Support of Objection of Licensees to Omnibus Motion of the Debtors for Entry of an Order (I) Authorizing the Rejection of Legacy Customer Contracts and (II) Granting Related Relief* [ECF No. 325].
 - m. *Declaration of Ryan Fonbuena in Support of Objection of Licensees to Omnibus Motion of the Debtors for Entry of an Order (I) Authorizing the Rejection of Legacy Customer Contracts and (II) Granting Related Relief* [ECF No. 326].
 - n. *Objection filed on behalf of CS Energy, LLC* [ECF No. 354].
 - o. *Response on behalf of Spark Power Renewables USA Inc.* [ECF No. 368].

- p. *Joinder of Invenergy Services LLC, Invenergy Storage Development LLC, El Sol Energy Storage LLC, and El Sol Storage Energy LLC* [ECF No. 374].

Related Documents:

- a. *Certificate of Mailing filed by Kurtzman Carson Consultants, LLC dba Verita Global* [ECF No. 111].
- b. *Motion to Seal re: EDF Power Solutions, Inc's Limited Objection* [ECF No. 298].
- c. *Application to Shorten Time on behalf of Ad Hoc Customer Group* [ECF No. 299].
- d. *Motion to Seal re: EsVolta, LP'S Limited Objection to and Reservation of Rights* [ECF No. 301].
- e. *Supplemental Certificate of Mailing* [ECF No. 320].

Status: This matter is being adjourned to August 6, 2025.

13. *Emergency Motion of Licensees for Entry of an Order (I) Compelling the Debtors to Comply with Section 365(N)(4) of the Bankruptcy Code, (II) Granting Adequate Protection Under Section 363(E) of the Bankruptcy Code, and (III) Granting Other Appropriate Relief Filed by Leah Eisenberg on behalf of DTE Electric Company, Leeward Renewable Energy, LLC, on behalf of Rabbitbrush Solar, LLC, Chaparral Springs, LLC, and Antelope Valley BESS, LLC, Longroad Energy Partners, on behalf of Serrano Solar, LLC, Sun Streams PVS, LLC, and Sun Streams Expansion, LLC* [ECF No. 117]. (**"Licensees Motion"**)

Response Deadline: July 8, 2025 at 4:00 PM

Responses/Replies Received:

- a. *Debtors' Objection to Application for Order Shortening Time for Notice of (A) Emergency Motion of Licensees for Entry of an Order (I) Compelling the Debtors to Comply with Section 365(n)(4) of the Bankruptcy Code, Granting Adequate Protection Under Section 363(e) of the Bankruptcy Code, and (B) Motion for Entry of an Order Authorizing Licensees to Redact and File Under Seal Confidential Information Contained in the Energy Supply Agreements and Long Term Services Agreements In Connection with Licensees' Motion to Compel* [ECF No. 128].
- b. *Notice of Hearing* [ECF No. 182].

- c. *Joinder of Esvolta, LP to Emergency Motion of Licensees for Entry of an Order (I) Compelling the Debtors to Comply with Section 365(n)(4) of the Bankruptcy Code, (II) Granting Adequate Protection Under Section 363(e) of the Bankruptcy Code, and (III) Granting Other Appropriate Relief* [ECF No. 273].
- d. *Joinder of EDF Power Solutions, Inc. to Emergency Motion of Licensees for Entry of an Order (I) Compelling the Debtors to Comply with Section 365(n)(4) of the Bankruptcy Code, (II) Granting Adequate Protection Under Section 363(e) of the Bankruptcy Code, and (III) Granting Other Appropriate Relief* [ECF No. 274].
- e. *Joinder and Reservation of Rights of CS Energy, LLC Regarding the Emergency Motion of Licensees for Entry of an Order (I) Compelling the Debtors to Comply with Section 365(n)(4) of the Bankruptcy Code, (II) Granting Adequate Protection Under Section 363(e) of the Bankruptcy Code, and (III) Granting Other Appropriate Relief on Behalf of CS Energy, LLC* [ECF No. 353].
- f. *Debtors' Omnibus (I) Objection to (A) Emergency Motion of Licensees for Entry of an Order (1) Compelling the Debtors to Comply with Section 365(n)(4) of the Bankruptcy Code, (2) Granting Adequate Protection Under Section 363(e) of the Bankruptcy Code and (B) Related Joinders and (II) Reply In Support of Omnibus Motion of the Debtors for Entry of an Order (A) Authorizing the Rejection of Legacy Customer Contracts and (B) Granting Related Relief* [ECF No. 357].

Related Documents:

- a. *Motion to Seal* [ECF No. 118].
- b. *Application to Shorten Time* [ECF No. 119].
- c. *Certificate of Service* [ECF No. 213].

Status: This matter has been adjourned to August 6, 2025.

[Concluded on the following page]

Dated: July 14, 2025

TOGUT, SEGAL & SEGAL LLP

/s/ Frank A. Oswald

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- and -

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