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Attorneys for Applicant and Secured Creditor
Expeditors International of Washington, Inc.

Hearing Date: To Be Set
Oral Argument Requested

**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)

TO:

HON. MICHAEL B. KAPLAN

SERVICE LIST

PLEASE TAKE NOTICE that the undersigned, attorneys for Attorneys for Applicant and Secured Creditor Expeditors International of Washington, Inc., shall apply before the Hon. Michael B. Kaplan, at the United States Bankruptcy Court for the District of New Jersey, United States Courthouse, Trenton, New Jersey, at a date and time fixed by the Court, for an Order pursuant to 11 U.S.C. §362, for an order shortening time for a hearing on Movant's concurrent

¹The Debtors in these Chapter 11 Cases are: (i) Powin Project LLC; (ii) Powin, LLC; (iii) PEOS Holdings, LLC; (iv) Powin China Holdings 1, LLC; (v) Powin China Holdings 2, LLC; (vi) Charger Holdings, LLC; (vii) Powin Energy Ontario Storage, LLC; (viii) Powin Energy Operating Holdings, LLC; and (ix) Powin Energy Operating, LLC.



motion for relief from the automatic stay for purposes of abandoning or liquidating certain collateral, and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 0913-2 (a) (2) any (i) opposition to this motion or (ii) cross motion must be filed and served not later than 7 days before the hearing date.

Dated: August 26, 2025

Respectfully submitted,

BRESSLER, AMERY & ROSS, P.C.
Attorneys for Movant

By: /s/ David H. Pikus
David H. Pikus

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**UNITED STATES BANKRUPTCY COURT
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In re:

Powin, LLC, *et al.*¹,
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Chapter 11

Case No. 25-16137 (MBK)

(Jointly Administered)

**APPLICATION FOR ORDER SHORTENING
TIME PERIOD FOR NOTICE UNDER FED. R. BANKR. P. 9006(c)(1)**

TO: THE HONORABLE MICHAEL B. KAPLAN
UNITED STATES BANKRUPTCY JUDGE

Expeditors International of Washington, Inc. (the “Applicant”), by and through its attorneys,
Bressler, Amery & Ross, P.C., for its Application For Order Shortening Time Period For Notice
Under *Fed.R. Bankr.P.* 9006(c)(1), respectfully represents:

1. The Applicant is a secured creditor in the above adversary proceeding. Applicant
seeks to shorten the notice time period on its motion for relief from the automatic stay to mitigate

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ongoing storage and demurrage costs at the port of entry for the goods subject to its liens (the “Motion”).

2. Expeditors is Expeditors is a non-vessel owned common carrier, freight forwarder, customs broker, warehouseman and provider of distribution and other logistics services. Expeditors provided such services to the Debtors prior to the commencement of this Bankruptcy Case.

3. The Motion seeks an order granting Expeditors relief from the automatic stay to permit abandonment and liquidation of its collateral. As of the Petition Date, the Debtor owed Expeditors the aggregate amount of approximately \$466,714.07 for transportation, storage and preservation of goods and other property, including freight, storage, distribution, Customs duties and fees, demurrage, detention, and other charges, plus late charges on the foregoing at [x]% per annum and attorneys’ fees. All charges continue to accrue. Significantly, storage charges continue to accrue with respect to the Petition Date Cargo at a rate of approximately \$6,592.42 per day.

4. Pursuant to the Contracts, as security for Expeditors’ claims, Expeditors holds duly-perfected first-priority liens on, and security interests in, the following:

- all of the Petition Date Cargo and related documents;
- all other property in Expeditors’ possession, custody or control or en route as of the Petition Date;
- all other goods, documents of title and other property which Expeditors made available to the Debtors for the purpose of ultimate sale or exchange or for loading, unloading, storing, shipping, transshipping, manufacturing, processing or otherwise dealing with them in a manner preliminary to their sale or exchange, and all documents related thereto; and
- all proceeds and products of any of the foregoing, including “cash collateral.”

5. Because the accrual of these charges is continuing and they are the ultimate responsibility of the Debtor, it would be in the interest of all interested constituencies to expedite the relief.

6. Reduction of the time period in question is not prohibited under Fed. R. Bankr. P. 9006(c)(1) and the Rules listed therein.

WHEREFORE, the Applicant requests an entry of the Order submitted herewith shortening time for hearing on relief from the automatic stay.

Respectfully submitted,

BRESSLER, AMERY & ROSS, P.C.
Attorneys for Applicant

By: /s/ David H. Pikus
David H. Pikus

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)
David H. Pikus (DP7846)

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Attorneys for Expeditors International of
Washington, Inc.

In Re:

POWIN, LLC *et al.*

Debtors.

Case No. 25-16137 (MBK)

Chapter 11

Judge: Hon. Michael B. Kaplan

Hearing Date: To Be Set

ORDER SHORTENING TIME PERIOD
FOR NOTICE AND SETTING HEARING

Upon consideration of the Application of Expeditors International of Washington, Inc., by and through its attorneys Bressler, Amery & Ross, P.C., and David H. Pikus, Esq., for notice under *Fed. R. Bankr. P.* 9006(c)(1), and for cause shown,

IT IS on this day of _____, 2025

ORDERED as follows:

1. The time period required by Local Bankruptcy Rule 9013-1 for notice of hearing on Expeditors International of Washington, Inc.'s Motion for Relief from Stay is hereby shortened as set forth herein.

2. A hearing shall be conducted on the aforesaid motion on _____, 2025 at _____ .m. in the United States Bankruptcy Court for the District of New Jersey, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, New Jersey in the

courtroom of the Honorable Michael B. Kaplan, U.S. Bankruptcy Judge.

3. True copies of this Order, the application for it, and the moving papers shall be served upon the attached service list by _____, sent no later than _____ days of the date hereof.

4. Any objections to said Application shall all be filed and served so as to be received no later than _____, 2025.

5. Court appearances will be required to prosecute said Application and any objections.

Dated: _____, 2025

Hon. _____, U.S.B.J.