

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

Caption in Compliance with D.N.J. LBR 9004-1(a)

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Counsel to Mainfreight Distribution Pty Ltd

In re:

Powin, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-16137 (MBK)

Judge: Michael B. Kaplan

(Jointly Administered)

APPLICATION FOR ORDER SHORTENING TIME

Mainfreight Distribution Pty Ltd (together with its parent, subsidiary, or any other affiliate entities, collectively, “Mainfreight”), by and through its undersigned counsel requests by this *Application for Order Shortening Time* (the “Application”) that the time to respond to *Mainfreight’s Motion to Compel Payment of Agreed-Upon Storage Fees by BHER Ravenswood*

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



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Solar I, LLC and for Sanctions against BHER Ravenswood Solar I, LLC (the “Motion”) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), for the reasons set forth below:

1. A shortened time for notice and hearing is requested because the Motion seeks to compel BHER Ravenswood Solar I, LLC (“BHER”) to comply with its obligations set forth by an order of this Court. As set forth in the Motion, BHER is required to make \$755,307.87 in payments to Mainfreight (the “Amount Due”) for storage and related expenses that Mainfreight has incurred (the “Storage Costs”) by storing goods in which BHER claims an interest (the “BHER Goods”). Despite a deadline of August 15, 2025 to pay the Amount Due, BHER has made no payments to Mainfreight at all, leaving Mainfreight no choice but to file the Motion and this Application to respectfully request that the Motion be heard on an expedited basis.

2. Mainfreight requests that the Motion be heard at the upcoming omnibus hearing scheduled for September 3, 2025, contemporaneously with *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* [D.I. 180]. Mainfreight submits that the Motion be heard on September 3 to avoid the additional delay and cost that would be associated with having the Motion heard on regular notice at the following omnibus hearing.

3. Mainfreight submits that no party in interest is prejudiced by this Application or the relief requested herein. All parties in interest will have sufficient time to review the Motion and respond if they so choose before the September 3 hearing. It is essential that Mainfreight be permitted to proceed on an expedited basis to avoid the cost and delay of not having the Motion heard until a following hearing.

4. Therefore, Mainfreight requests that the Court hear the Motion on September 3, 2025.

5. This shortening of time is not prohibited by Bankruptcy Rule 9006(c)(1).

WHEREFORE, Mainfreight respectfully requests entry of the proposed order shortening time, in substantially the form submitted herewith, granting the relief requested herein, and such other relief as is just and proper under the circumstances.

Dated: September 2, 2025

Respectfully submitted,

**BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP**

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re:
Powin, LLC, et al.

Case No.: 25-16137 (MBK)

Chapter: 11

Judge: Michael B. Kaplan

**ORDER SHORTENING TIME PERIOD FOR NOTICE,
SETTING HEARING AND LIMITING NOTICE**

The relief set forth on the following pages, numbered two (2) and three (3), is hereby **ORDERED**.

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After review of the application of Mainfreight Inc ("Mainfreight") for a reduction of time for a hearing on Mainfreight's Motion to Compel Payment of Agreed-Upon Storage, Transportation, and Associated Costs and for Sanctions under Fed. R. Bankr. P. 9006(c)(1), it is

ORDERED as follows:

1. A hearing will be conducted on the matter on September 3, 2025 at 11:30 a.m. in the United States Bankruptcy Court, 402 E. State Street, Trenton, NJ 08608 Courtroom No. 8.

2. The Applicant must serve a copy of this Order, and all related documents, on the following parties:
All Parties Pursuant to F.R.B.P. 2002, the Debtors, the UST, & BHER Ravenswood Solar 1, LLC

by ☐ each, ☒ any of the following methods selected by the Court:

☐ fax, ☐ overnight mail, ☐ regular mail, ☒ email, ☐ hand delivery.

3. The Applicant must also serve a copy of this Order, and all related documents, on the following parties:

by ☐ each, ☐ any of the following methods selected by the Court:

☐ fax, ☐ overnight mail, ☐ regular mail, ☐ email, ☐ hand delivery.

4. Service must be made:

☒ on the same day as the date of this order, or

☐ within _____ day(s) of the date of this Order.

5. Notice by telephone:

☒ is not required

☐ must be provided to _____

☐ on the same day as the date of this Order, or

☐ within _____ day(s) of the date of this Order.

6. A *Certification of Service* must be filed prior to the hearing date.

7. Any objections to said motion/application identified above:

☐ must be filed with the Court and served on all parties in interest by electronic or overnight mail _____ day(s) prior to the scheduled hearing; or

☒ may be presented orally at the hearing.

8. ☒ Court appearances are required to prosecute said motion/application and any objections.

☐ Parties may request to appear by phone by contacting Chambers prior to the return date.

9. ☒ The hearing will be conducted via Zoom using the Judge's standard Zoom link for remote appearances, which can be found on the Judge's page on the Court's website:

<https://www.njb.uscourts.gov/>

☐ The hearing will be conducted via a specialized Zoom link. See instructions below:

To present argument remotely, parties must request panelist status by emailing Chambers at chambers_of_mbk@njb.uscourts.gov.

Telephonic information for observation purposes will be posted to Judge Kaplan's page on the Court's website.