

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**
Caption in Compliance with DNJ LBR 9004-1(b)

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Washington, Inc.*

Chapter: 11

Case No.: 25-16137 (MBK)

Judge: Hon. Michael B. Kaplan, U.S.B.J.

Hearing Date: Sept. 3, 2025

IN RE:

POWIN, LLC et al.,

Debtors.

**CERTIFICATION CONCERNING
PROPOSED ORDER**

I, David H. Pikus, a Principal of the law firm of Bressler, Amery & Ross, P.C., certify that with respect to the proposed order submitted to the court, the following is true and correct to the best of my knowledge.

For the matter titled In re Powin, LLC, heard on September 3, 2025, the Court directed the submission of a proposed order. On September 10, 2023, a copy of the proposed order, annexed hereto as Exhibit A, was served upon counsel via email annexed hereto as Exhibit B. No counsel has objected or filed any response to the proposed order.

BRESSLER, AMERY & ROSS, P.C.
*Attorneys for Creditor Expeditors Intl. of
Washington, Inc.*

By: 
DAVID H. PIKUS

DATED: September 23, 2025



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EXHIBIT A

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

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Washington, Inc.

Case No. 25-16137 (MBK)

Chapter 11

In Re:

POWIN, LLC *et al.*

Judge: Hon. Michael B. Kaplan

Hearing Date: Sept. 3, 2025

Debtors.

**ORDER GRANTING EXPEDITORS INTERNATIONAL OF WASHINGTON, INC
RELIEF FROM THE AUTOMATIC STAY**

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

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Debtor: Powin, LLC

Case No: 25-16137(MBK)

Caption of Order: ORDER GRANTING EXPEDITORS INTERNATIONAL OF WASHINGTON, INC RELIEF FROM THE AUTOMATIC STAY

Upon consideration of movant, Expeditors International of Washington, Inc's application for an order granting it relief from the automatic stay, and the Court having heard argument and set forth its determination on the record on September 3, 2025 and good cause appearing therefor, it is hereby

ORDERED as follows:

1. The motion is granted, to be effective September 25, 2025.
2. Expeditors International of Washington, Inc. is hereby granted relief from the automatic stay (11 U.S.C. § 362) to the extent set forth below.
3. Expeditors International of Washington, Inc. may abandon or liquidate certain property, the Petition Date Cargo, as defined in movant's Motion for Relief from Stay and recited on Exhibit A hereto, in order to reduce Movant's claims and the claims against the estate.
4. Expeditors International of Washington, Inc. is authorized to apply the proceeds of any such liquidation to the secured debt owed to Expeditors International of Washington, Inc. in accordance with applicable state law.
5. Expeditors International of Washington, Inc. shall file a report of sale promptly following any liquidation of the Petition Date Cargo. If any excess proceeds exist, Expeditors International of Washington, Inc. shall remit same to the Debtor-in-Possession. Expeditors International of Washington, Inc. is given leave to file an unsecured deficiency claim within sixty (60) days from the date of liquidation, if such claim exists.

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Debtor: Powin, LLC

Case No: 25-16137(MBK)

Caption of Order: ORDER GRANTING EXPEDITORS INTERNATIONAL OF WASHINGTON, INC RELIEF FROM THE AUTOMATIC STAY

6. Expeditors International of Washington, Inc. shall be permitted to reasonably communicate with Debtors and Debtors' counsel to the extent necessary to comply with applicable non-bankruptcy law.

7. In the event that Expeditors International of Washington, Inc., the Debtors and the Official Committee of Unsecured Creditors are able to reach an agreement on disposition of the Petition Date Cargo or any portion thereof prior to September 25, 2025, they may submit a proposed order to the Court with service in accordance with Paragraph 9 below.

8. Good cause having been shown, Expeditors International of Washington, Inc. may proceed to abandon or liquidate the Petition Date Cargo, subject to Paragraph 1 of this Order. The 14-day waiting period pursuant to Rule 4001(a)(3) is hereby modified accordingly.

9. Expeditors International of Washington, Inc. shall serve a copy of this Order on counsel for the Debtor and for the Official Committee of Unsecured Creditors, and any other party who entered an appearance on the motion not registered for ECF service.

EXHIBIT B

From: Rodney Nelson

Sent: Wednesday, September 10, 2025 12:54 PM

To: 'lauren.macksound@dentons.com' <lauren.macksound@dentons.com>;
'frankoswald@teamtogut.com' <frankoswald@teamtogut.com>;
'dclarke@genovaburns.com' <dclarke@genovaburns.com>; 'slong@genovabrns.com'
<slong@genovabrns.com>; 'jmcdonnell@genovaburns.com'
<jmcdonnell@genovaburns.com>; 'dstolz@genovaburns.com'
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Cc: 'lauren.bielskie@usdoj.gov' <lauren.bielskie@usdoj.gov>;
'jeffrey.m.sponder@usdoj.gov' <jeffrey.m.sponder@usdoj.gov>; David Pikus
<DPikus@bressler.com>

Subject: 25-16137 (Powin, LLC) Proposed Form of Order

Counsel,

Please see attached for the Proposed Form of Order. Please confirm, via response to this email, that: (i) you have reviewed the Order; (ii) agree that it comports with the Court's ruling; and (iii) it may be entered without being held for 7 days under D.N.J. LBR 9013-4(d).

If you have any questions, please do not hesitate to contact me.

Best,

RKN

Rodney Nelson

Associate



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