Docket #0002 Date Filed: 1/21/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	§	Case No. 25-90817 (CML)
	§	
AMPLE, INC., *et al.*,[1]	§	Chapter 11
	§	
Debtors.	§	(Jointly Administered)

SABRINA OHANIAN, HENRY SMITH and MARICELA GUERRERO SANTO on behalf of themselves and all others similarly situated,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Adversary Proceeding No. 25-09001
	§	
AMPLE, INC. *aka* Ample Energy, Inc.	§	
	§	
Defendant.	§	

NOTICE OF FILING OF PROPOSED STIPULATION AND AGREED ORDER APPROVING MEDIATION BETWEEN DEBTORS AND WARN ACT PLAINTIFFS

PLEASE TAKE NOTICE that Plaintiffs Sabrina Ohanian, Henry Smith, and Maricela Guerrero Santo on behalf of themselves and all others similarly situated (the "WARN Act Plaintiffs") and Debtor Defendant Ample, Inc. ("Ample") have reached an agreement to conduct a mediation regarding the *Class Action Adversary Proceeding Complaint* in the above-captioned Adversary Proceeding No. 25-09001.

PLEASE TAKE FURTHER NOTICE that the mediation will be conducted before former United States Bankruptcy Judge Harlin DeWayen Hale.

PLEASE TAKE FURTHER NOTICE that the WARN Act Plaintiffs and Ample hereby file this proposed Stipulation and Agreed Order, which attached hereto as **Exhibit A** (the "Proposed Order").

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[1] The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are: Ample Inc. (4015) and Ample Texas EV, LLC (6832). A copy of this notice is available on (a) the Court's website, at www.txs.uscourts.gov and (b) the website maintained by the Debtors' claims and noticing agent, Verita Global at https://veritaglobal.net/ample.

Date: January 21, 2026

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Proposed Counsel for Defendant Debtor Ample, Inc.

Certificate of Service

I certify that on January 21, 2026, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Hugh M. Ray, III
Hugh M. Ray, III

Exhibit A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	§	Case No. 25-90817 (CML)
	§	
AMPLE, INC., *et al.*,[2]	§	Chapter 11
	§	
Debtors.	§	(Jointly Administered)

SABRINA OHANIAN, HENRY SMITH and MARICELA GUERRERO SANTO on behalf of themselves and all others similarly situated,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Adversary Proceeding No. 25-09001
	§	
AMPLE, INC. *aka* Ample Energy, Inc.	§	
	§	
Defendant.	§	

STIPULATION AND AGREED ORDER APPROVING MEDIATION BETWEEN DEBTORS AND WARN ACT PLAINTIFFS BEFORE THE HONORABLE HARLIN D. HALE (ret.)

This Stipulation and Agreed Order (this "Stipulation and Agreed Order") is entered into by Debtor Ample, Inc. ("Ample") and Sabrina Ohanian, Henry Smith, and Maricela Guerrero Santo on behalf of themselves and all others similarly situated (the "WARN Act Plaintiffs," and together with Ample, the "Parties"). The Parties hereby stipulate and agree as follows:

Recitals

A. On December 16, 2025 (the "Petition Date"), the Ample and its Debtor affiliate each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code (the "Chapter 11

[2] The Debtors in these chapter 11 cases and the last four digits of each Debtor's taxpayer identification number are: Ample, Inc. (4015) and Ample Texas EV, LLC (6832). A copy of this notice is available on (a) the Court's website, at www.txs.uscourts.gov and (b) the website maintained by the Debtors' claims and noticing agent, Verita Global at https://veritaglobal.net/ample.

Cases") in the United States Bankruptcy Court for the Southern District of Texas (the "Court"). The Debtors continue to operate their businesses and manage their properties as debtors in possession under sections 1107(a) and 1108 of the Bankruptcy Code. The Chapter 11 Cases are being jointly administered for procedural purposes pursuant to Bankruptcy Rule 1015(b) and Bankruptcy Local Rule 1015-1. No trustee or examiner has been appointed in the Chapter 11 Cases.

B. The Official Committee of Unsecured Creditors (the "Committee") was appointed on December 30, 2025. Sabrina Ohanian, a WARN Act Plaintiff, is a member of the Committee.

C. On December 17, 2025, the WARN Act Plaintiffs commenced an adversary proceeding against Ample in these Chapter 11 Cases by filing a *Class Action Adversary Proceeding Complaint*, docketed under Adversary Proceeding No. 25-09001 (the "Adversary Proceeding").

D. The Parties now agree to attempt to resolve the issues raised in the Adversary Proceeding through mediation.

E. The Parties contacted former United States Bankruptcy Judge Harlin D. Hale through JAMS (f/k/a Judicial Arbitration and Mediation Services). Judge Hale is available to conduct a mediation on March 24, 2026 via Zoom or other videoconferencing platform.

NOW, THEREFORE, IT IS STIPULATED AND HEREBY ORDERED THAT:

1. The Stipulation and Agreed Order is APPROVED.

2. This Court authorizes Ret. Judge Harlin D. Hale (the "Mediator") to conduct a mediation between the WARN Act Plaintiffs and Ample concerning the *Class Action Adversary Proceeding Complaint* as requested herein (the "Mediation") to be held on March 24, 2026 or another date agreed to by the Parties and Mediator.

3. The Adversary Proceeding and all deadlines therein are abated until further order of the Court.

4. The Court adopts the Section S of the Procedures for Complex Cases in the Southern District of Texas (effective September 18, 2024) concerning mediations; *provided*, that nothing herein shall alter, modify, or otherwise prejudice or impair any of the Parties' rights or obligations under any preexisting confidentiality agreements or protective orders, all of which shall remain in full force and effect.

5. One or more principals for each Party, as well as lead counsel for each Party, shall remotely attend the Mediation and such other conferences as the Mediator deems appropriate. Co-counsel and financial advisors may also participate in the Mediation. Other parties-in-interest may participate in relevant portions of the Mediation at the discretion of the Mediator to the extent issues arise in the Mediation that require their input.

6. The mediation shall terminate on the date that Judge Hale determines that it has terminated and so advises the Parties.

7. Each Party shall bear its own costs and expenses incurred in connection with the Mediation; *provided, however*, nothing herein shall prejudice any Party's right to seek payment or reimbursement from the Debtors' estates of such costs and expenses, including attorney fees, in accordance with any Court orders or otherwise.

8. Each Party may directly submit to the Mediator any materials (the "Submissions") in form and content as the Mediator directs. Prior to the Mediation, the Mediator may confer with one or more of the Parties to determine what materials would be helpful to the Mediator or the Mediation. The Submissions shall not be filed with the Court.

9. The Mediation will be considered confidential settlement discussions pursuant to Rule 408 of the Federal Rules of Evidence, made applicable by Federal Rules of Bankruptcy Procedure 9017. Any (a) discussions among the Parties, including discussions with or in the presence of the Mediator; (b) mediation statements or any other documents or information provided to the Mediator or the Parties in the course of the Mediation; (c) correspondence, draft resolutions produced in connection with, or as a result of, the Mediation; and (d) offers, and counteroffers ((a) through (d), collectively, the "Mediation Information"), shall be (i) strictly confidential; (ii) subject to disclosure only to the Mediator and the Parties to which the Mediation Information is provided; (iii) not constitute a waiver of any existing privileges or immunities (even if such privileged information is produced during the Mediation); and (iv) not be admissible, discoverable or otherwise used for any purpose in any proceeding outside of the Mediation, including any judicial or administrative proceeding. No person, including counsel, shall in any way disclose to any person not expressly permitted to see Mediation Information under this Order or to any court, including, without limitation, in any pleading or other submission to any court, any such Mediation Information, unless all Parties to the Mediation consent to disclosure. The confidentiality provisions in this paragraph 9 shall not prevent a Party from using or disclosing materials and information it has created (with its own information) in any way it sees fit (subject to other applicable law), and does not prevent the use or disclosure of materials and information that is a matter of public knowledge, provided that the material and information did not become public knowledge through an act or omission of a Party other than the Party who created it.

10. The Parties, the Mediator, and all participants in the Mediation shall protect proprietary information.

11. The disclosure by a Party of privileged information to the Mediator does not waive or otherwise adversely affect the privileged nature of such information.

12. No Party may be served with a summons, subpoena, notice, or other pleading during the Mediation or at the location where the Mediation is occurring.

13. The Parties and their respective counsel shall participate in the Mediation in good faith and comply with all directions issued by the Mediator regarding the mediation process.

14. The Bankruptcy Court shall retain jurisdiction to hear any matters or disputes arising from or relating to this Stipulation and Agreed Order.

Signed: _____

Christopher M. Lopez
United State Bankruptcy Judge

APPROVED AS TO FORM AND SUBSTANCE:

Date: January 21, 2026

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