Docket #1618 Date Filed: 02/11/2026

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	**Chapter 11**
NU RIDE INC., *et al.*,[1]	)	**Case No. 23-10831 (MFW)** **(Jointly Administered)**
Reorganized Debtors.	)	**RE: D.I. 1139**

CERTIFICATION OF COUNSEL REGARDING TERIS-PHOENIX, LLC'S APPLICATION FOR ALLOWANCE AND PAYMENT OF CHAPTER 11 ADMINISTRATIVE EXPENSES AND UNPAID CURE AMOUNTS

I, Ronald S. Gellert, Esq., of Gellert Seitz Busenkell & Brown, LLC, counsel to TERIS-Phoenix, LLC ("TERIS"), hereby certify as follows:

1. On April 15, 2024, the TERIS filed its *Application For Allowance and Payment of Chapter 11 Administrative Expenses and Unpaid Cure Amounts* (the "Motion") [D.I. 1139].

2. Pursuant to the Notice filed with the Motion, the deadline to object or otherwise comment on the entry of an order approving the Motion was set for April 28, 2024, at 4:00 pm (ET) (the "Objection Deadline").

3. Prior to the Objection Deadline, counsel to Alan D. Halperin, solely in his capacity as the Claims Ombudsman ("Claims Ombudsman") provided informal comments.

4. TERIS has revised the proposed order in accordance with the Claims Ombudsman's comments.

5. The undersigned certifies that he has reviewed the Court's docket for this case and no other answer, objection or responsive pleading to the Motion appears thereon.

[1] The Reorganized Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Reorganized Debtors' service address is: Nu Ride Inc. c/o William Gallagher, CEO, M 3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

2310831260211000000000001

6. A copy of the revised proposed order is attached hereto as **Exhibit A**. A blackline of the proposed order marked against the version filed with the court is attached hereto as **Exhibit B**.

WHEREFORE, the undersigned respectfully requests that the Court enter the proposed order attached hereto as **Exhibit A**, without further notice or hearing.

Dated: February 11, 2026

GELLERT SEITZ BUSENKELL & BROWN LLC

/s/ Ronald S. Gellert
Ronald S. Gellert (DE 4259)
1201 N. Orange Street, 3rd Floor
Wilmington, DE 19801
Telephone: (302) 425-5806
Fax: (302) 425-5814
Email: rgellert@gsbblaw.com

and

SPENCER FANE LLP
Andrea Chase, Esq.
Misty A. Segura, Esq.
1000 Walnut, Suite 1400
Kansas City, MO 64106
Telephone: (816) 292-8279
achase@spencerfane.com
msegura@spencerfane.com

Counsel for TERIS-Phoenix, LLC

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	**Chapter 11**
NU RIDE INC., *et al.*,[1]	)	**Case No. 23-10831 (MFW)** **(Jointly Administered)**
Reorganized Debtors.	)	**RE: D.I. 1139**

ORDER GRANTING TERIS-PHOENIX, LLC'S APPLICATION FOR ALLOWANCE AND PAYMENT OF CHAPTER 11 ADMINISTRATIVE EXPENSES AND UNPAID CURE AMOUNTS

Upon consideration of the Application of TERIS-Phoenix, LLC for Allowance and Payment of Chapter 11 Administrative Expenses and Unpaid Cure Amounts; and the Court having jurisdiction to consider the Application and relief requested therein pursuant to 28 U.S.C. § 1334; and consideration of the Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (B), and (O); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Application having been provided and no further notice required; and upon the Court's review of the Application and any responses or objections thereto; and upon the Court's determination that the legal and factual bases set forth in the Application establish just cause for the relief requested therein; and upon all of the proceedings had before the Court and after due deliberation, it is hereby **ORDERED THAT**:

1. The Application is **APPROVED**.

[1] The Reorganized Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Reorganized Debtors' service address is: Nu Ride Inc. c/o William Gallagher, CEO, M 3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

2. TERIS-Phoenix, LLC shall have an allowed administrative expense claim pursuant to 11 U.S.C. § 503(b) against Lordstown Motors Corporation in the amount of $15,525.45 for post-petition services.

3. In addition, Lordstown Motors Corporation shall also pay TERIS-Phoenix, LLC unpaid cure costs in the amount of $50,339.16 within fifteen (15) days from entry of this Order.

4. The relief granted herein shall be in full and final satisfaction of all outstanding pre-Effective Date liabilities of the Debtors to TERIS-Phoenix, LLC, including, but not limited to, those set forth in proof of claim 1153 ("Claim 1153"), the Debtors' Schedules of Assets and Liabilities (the "Schedule") and the Order (I) Authorizing the Assumption of Certain Executory Contracts, (II) Fixing Cure Costs in Connection Thereto, and (III) Granting Related Relief [Docket No. 1054]. For the avoidance of doubt, upon payment to TERIS-Phoenix, LLC of the amounts set forth in Paragraph 3 of this Order, Claim 1153 and the Schedule, are hereby satisfied and expunged.

5. This Court shall retain exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

EXHIBIT B

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
NU RIDE INC. . *et al.*,[1]	)	Case No. 23-10831 (MFW)
	)	(Jointly Administered)
Reorganized Debtors.	)	
	)	RE: D.I. 1139

~~In re:~~ ~~Chapter 11~~

~~LORDSTOWN MOTORS CORP. *et al.*,[2]~~ ~~Case No. 23-10831 (MFW)~~

~~Debtors.~~ ~~(Jointly Administered)~~

ORDER GRANTING TERIS-PHOENIX, LLC'S APPLICATION FOR ALLOWANCE AND PAYMENT OF CHAPTER 11 ADMINISTRATIVE EXPENSES AND UNPAID CURE AMOUNTS

Upon consideration of the Application of TERIS-Phoenix, LLC for Allowance and Payment of Chapter 11 Administrative Expenses and Unpaid Cure Amounts; and the Court having jurisdiction to consider the Application and relief requested therein pursuant to 28 U.S.C. § 1334; and consideration of the Application and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A), (B), and (O); and venue being proper before this Court

---

[1] The Reorganized Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Reorganized Debtors' service address is: Nu Ride Inc. c/o William Gallagher, CEO, M 3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

~~[2] The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corporation (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.~~

pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Application having been provided and no further notice required; and upon the Court's review of the Application and any responses or objections thereto; and upon the Court's determination that the legal and factual bases set forth in the Application establish just cause for the relief requested therein; and upon all of the proceedings had before the Court and after due deliberation, it is hereby **ORDERED THAT**:

1. The Application is **APPROVED**.

2. TERIS-Phoenix, LLC shall have an allowed administrative expense claim pursuant to 11 U.S.C. § 503(b) against Lordstown Motors Corporation in the amount of $15,525.45 for post-petition services.

3. In addition, Lordstown Motors Corporation shall also pay TERIS-Phoenix, LLC unpaid cure costs in the amount of $50,339.16 within fifteen (15) days from entry of this Order.

4. The relief granted herein shall be in full and final satisfaction of all outstanding pre-Effective Date liabilities of the Debtors to TERIS-Phoenix, LLC, including, but not limited to, those set forth in proof of claim 1153 ("Claim 1153"), the Debtors' Schedules of Assets and Liabilities (the "Schedule") and the Order (I) Authorizing the Assumption of Certain Executory Contracts, (II) Fixing Cure Costs in Connection Thereto, and (III) Granting Related Relief [Docket No. 1054]. For the avoidance of doubt, upon payment to TERIS-Phoenix, LLC of the amounts set forth in Paragraph 3 of this Order, Claim 1153 and the Schedule, are hereby satisfied and expunged.

54. This Court shall retain exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.