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)
Reorganized Debtors.	(Jointly Administered)
	Obj. Deadline: March 17, 2026 at 4:00 p.m. (ET) **Hearing Date: March 31, 2026 at 2:00 p.m. (ET)**

POST-EFFECTIVE DATE DEBTORS' AND CLAIMS OMBUDSMAN'S FOURTH JOINT MOTION FOR ENTRY OF AN ORDER EXTENDING THE CLAIMS OBJECTION DEADLINE TO SEPTEMBER 8, 2026

Nu Ride Inc. and its affiliated reorganized debtors in the above-captioned proceeding (the "Post-Effective Date Debtors" and, prior to confirmation, the "Debtors") and Alan Halperin, solely in his capacity as Claims Ombudsman (the "Claims Ombudsman" and together with the Post-Effective Date Debtors, the "Movants") hereby move (this "Motion") for entry of an order, substantially in the form attached hereto as **Exhibit A**, extending the deadline to object to claims by approximately 180 days, from March 9, 2026 ("Claims Objection Deadline"), through and including September 8, 2026. In support of the Motion, Movants respectfully state as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334.

2. Venue of this proceeding and the Motion is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory and legal predicates for the relief requested herein is sections 105(a),

[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 Alex Matina, CEO, M 3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

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502, and 503 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "Bankruptcy Code"), Rule 9006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Local Rules 9006-1 and 9006-2.

BACKGROUND

4. On June 27, 2023 (the "Petition Date"), the Debtors each commenced with this Court a voluntary case under chapter 11 of the Bankruptcy Code (collectively, the "Chapter 11 Cases"). These Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1. The Post-Effective Date Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On July 11, 2023, the Office of the United States Trustee for the District of Delaware (the "U.S. Trustee") appointed the official committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code. [D.I. 99]. On September 7, 2023, the U.S. Trustee appointed the official committee of equity security holders pursuant to section 1102 of the Bankruptcy Code. [D.I. 375]. No trustee or examiner been appointed in these Chapter 11 Cases.

5. Additional factual background and information regarding the Debtors, including their business operations, their corporate and capital structure, and the events leading to the commencement of these chapter 11 cases, is set forth in detail in forth in the *Declaration of Adam Kroll in Support of the Debtors' Chapter 11 Petitions and First Day Motions.* [D.I. 15].

6. On August 24, 2023, the Court entered the *Order (A) Establishing Bar Dates and Related Procedures for Filing Proofs of Claim, Including Claims Arising Under Section 503(b)(9) of the Bankruptcy Code, (B) Approving the Form, Manner, and Procedures of Notice Thereof, and (C) Granting Related Relief* (the "Bar Date Order") [D.I. 319].

7. The Bar Date Order established October 10, 2023, at 5:00 p.m. (prevailing Eastern Time) as the deadline for creditors to file proofs of claim for each claim they assert against the Debtors that arose before the Petition Date (the "General Bar Date"). The Bar Date Order also established the governmental bar date for governmental units to file proofs of claims against any Debtor as December 26, 2023, at 5:00 p.m. (Prevailing Eastern Time). Additionally, the Bar Date Order approved the form proof of claim to be filed against the Debtors and the manner of giving notice of the General Bar Date (the "Bar Date Notice"). The Bar Date Notice was published in The Wall Street Journal on August 31, 2023 [D.I. 591].

8. On March 6, 2024, the Court confirmed the *Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors* [D.I. 1066] (the "Plan," and the Order confirming the Plan [D.I. 1069], the "Confirmation Order"). The Plan went Effective on March 14, 2024 (the "Effective Date").

9. Pursuant to the Confirmation Order and Plan, on the Effective Date, Alan D. Halperin was appointed Claims Ombudsman ("Claims Ombudsman") in these Chapter 11 Cases. *See* Confirmation Order, ¶ 68; Plan, Article V.D.1. As Claims Ombudsman, Alan D. Halperin has the right, authority, and responsibility to object to, seek to subordinate, compromise or settle any and all General Unsecured Claims, including by filing and prosecuting objections to General Unsecured Claims, subject to the limitations set forth in the Plan. Confirmation Order, ¶ 69, Plan, Article V.D.2. Additionally, the Claims Ombudsman has the right to assert any and all rights and defenses that the applicable Debtor had with respect to any General Unsecured Claim immediately before the Effective Date. *Id*. All rights not expressly delegated to the Claims Ombudsman under the Plan are expressly reserved to the Post-Effective Date Debtors. *Id*.

10. The Plan established September 10, 2024 as the deadline to (i) object to Administrative Claims (defined in the Plan as the "Administrative Claims Objection Deadline"), and (ii) object to Claims other than Administrative Claims and Professional Fee Claims (defined in the Plan as the "Claims Objection Deadline"). *See* Plan, Articles I(A)(6), I(A)(27), II(A) and VII(B). For the sake of simplicity, the Administrative Claims Objection Deadline and Claims Objection Deadline shall be collectively referred to herein as the Claims Objection Deadline and the relief requested herein shall pertain to both deadlines.

11. On September 9, 2024, the Movants filed the *Post-Effective Date Debtors' and Claims Ombudsman's Joint Motion for Entry of an Order Extending the Claims Objection Deadline to September 8, 2025* [D.I. 1302] prior to the expiration of the initial Claims Objection Deadline. On September 20, 2024, the Court entered an order extending the Claims Objection Deadline through September 8, 2025 [D.I. 1326].

12. On February 25, 2025, the Movants filed the *Post-Effective Date Debtors' and Claims Ombudsman's Second Joint Motion for Entry of an Order Extending the Claims Objection Deadline to September 8, 2025* [D.I. 1477] prior to the expiration of the extended Claims Objection Deadline. On March 6, 2025, the Court entered an order extending the Claims Objection Deadline through September 8, 2025 [D.I. 1483].

13. On September 9, 2025, the Movants filed the *Post-Effective Date Debtors' and Claims Ombudsman's Second Joint Motion for Entry of an Order Extending the Claims Objection Deadline to March 9, 2026*[2] [D.I. 1557]. On September 25, 2025, the Court entered an order extending the Claims Objection Deadline through March 9, 2026 [D.I. 1571].

[2] Due to a scrivener's error, the motion was inadvertently titled "second" instead of "third".

14. Although the Movants have been working diligently together to effectuate the claims reconciliation process and have jointly filed a number of substantive and non-substantive objections, additional work remains.

CLAIMS RECONCILIATION PROCESS

15. The register of claims (the "Claims Register") prepared and maintained by Verita Global, f/k/a Kurtzman Carson Consultants LLC ("KCC"), reflects that, as of the date of this Motion, 1,654 proofs of claim of varying priority levels, including general unsecured, secured, priority and administrative claims (collectively, the "Filed Claims"), have been filed in these Chapter 11 Cases. In addition, 2,573 claims were listed in the Debtors' schedules of assets and liabilities, as filed in these Chapter 11 Cases on August 1, 2023 (collectively, the "Scheduled Claims"). Many of these claims have been addressed in the ordinary course, but some required further diligence and confirmation. Finally, as of the date of this Motion, 2 motions or other requests for payment of Administrative Claims (the "Administrative Claim Requests") have been filed with the Court.

16. Since the Effective Date, the Post-Effective Date Debtors have been working to stabilize their business, improve cash flow and ensure that the business remains viable. During that time, the Movants have also spent time reconciling the Filed Claims, Scheduled Claims, and Administrative Claim Requests (if any), as expeditiously as possible. Although the Movants have been working diligently to reconcile Claims, additional work remains. The Movants will continue to work through the unresolved Claims and Administrative Claim Requests as quickly as possible under the circumstances but will require additional time to do so.

17. The Movants respectfully request entry of an order extending the Claims Objection Deadline for a period of approximately 180 days[3] through and including September 8, 2026.[4] The proposed extension is without prejudice to the rights of the Movants to seek additional extensions of the Claims Objection Deadline, as appropriate.

BASIS FOR RELIEF

18. Sections 502 and 503 of the Bankruptcy Code contemplate that, claims will be challenged when appropriate and, if necessary, estimated. *See* 11 U.S.C. §§ 502(b)–(c), 503. The Plan vests the discretion to object to or seek estimation of Claims and Administrative Claim Requests of the Post-Effective Date Debtors' estate.

19. Bankruptcy Rule 9006(b) also provides for extensions of time for cause. Specifically:

> [W]hen an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion … with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order.

Fed R. Bankr. P. 9006(b)(1).

20. Finally, section 105 of the Bankruptcy Code provides that the "court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title." 11 U.S.C. § 105(a).

[3] One-hundred and eighty days from March 9, 2026 is September 5, 2026, which is a Saturday.

[4] Pursuant to Local Rule 9006-2, the filing of this Motion prior to the expiration of the current Claims Objection Deadline serves to automatically extend the Claims Objection Deadline until such time as the Court rules on this Motion. *See* Del. Bankr. LR 9006-2.

21. The Movants submit that extension of the Claims Objection Deadline is fundamental to the efficient administration of the Post-Effective Date Debtors' Plan and estate and is in the best interests of creditors. As discussed above, the Movants have been working diligently since the Effective Date and have addressed many claims-related and other matters in a short amount of time.

22. Since the Effective Date, the Movants have worked to address the Claims and Administrative Claim Requests, in addition to the myriad of other day-to-day tasks undertaken by the Post-Effective Date Debtors. To ensure the fair and proper administration of the Post-Effective Date Debtors' estate, the Movants require additional time to reconcile the remaining Claims and Administrative Claim Requests and, only if appropriate, to file objections. The requested extension of the Claims Objection Deadline will not prejudice any claimant or other party in interest and will benefit creditors holding valid claims of all priority levels.

23. As the reconciliation process remains ongoing, the Movants request this extension of time to preserve their right to object to any additional claims that come to their attention or that they are unable to resolve. Extension of the Claims Objection Deadline is not sought for purposes of delay, nor will it affect any claimant's substantive defense(s) to any objection. Rather, the extension is intended to ensure that Claims and Administrative Claim Requests will only be challenged after a meaningful review.

24. Absent the extension, the Post-Effective Date Debtors' estate may suffer unnecessary and unfair prejudice. The Movants will be precluded from challenging invalid, misclassified and/or overstated Claims or Administrative Claim Requests, as applicable.

25. The requested extension will not only allow the Movants to properly review any remaining unresolved Claims and Administrative Claim Requests but will also conserve the

limited resources of the Post-Effective Date Debtors' estate and the Administrative and Priority Claims Reserve to the benefit of all the Post-Effective Date Debtors' stakeholders by allowing the Movants time to pursue settlement, and avoid the delay and expense of unnecessary objections and litigation.

RESERVATION OF RIGHTS

26. While the Movants will endeavor to resolve all of the remaining unresolved Claims and Administrative Claim Requests within the time of the requested extension, the Post-Effective Date Debtors reserve all of its rights to seek further extensions of the Claims Objection Deadline, as appropriate, as well as to object to and/or seek estimation of particular Claims.

NOTICE

27. Notice of this Motion will be provided to (i) the Office of the United States Trustee for the District of Delaware and (ii) all parties who, as of the filing of the Motion, have filed a notice of appearance and request for service of papers pursuant to Bankruptcy Rule 2002. A copy of this Motion is also available on the Post-Effective Date Debtors' case website at https://veritaglobal.net/lordstown. In light of the procedural nature of the post-confirmation relief requested herein, the Movants submit that such notice is sufficient under the circumstances and that no other or further notice is required.

[*Remainder of Page Intentionally Left Blank*]

WHEREFORE, the Movants respectfully request that this Court enter an order, substantially in the form attached hereto as **Exhibit A**: (i) extending the Claims Objection Deadline through and including September 8, 2026, without prejudice to the rights of the Movants to seek additional extensions of such deadline as appropriate; and (ii) granting such other and further relief as the Court may deem just and proper.

Dated: March 3, 2026
Wilmington, Delaware

MORRIS JAMES LLP

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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)
Reorganized Debtors.	(Jointly Administered)
	Obj. Deadline: March 17, 2026 at 4:00 p.m. (ET) **Hearing Date: March 31, 2026 at 2:00 p.m. (ET)**

NOTICE OF POST-EFFECTIVE DATE DEBTORS' AND CLAIMS OMBUDSMAN'S FOURTH JOINT MOTION FOR ENTRY OF AN ORDER EXTENDING THE CLAIMS OBJECTION DEADLINE TO SEPTEMBER 8, 2026

PLEASE TAKE NOTICE that on March 3, 2026, Nu Ride Inc. and its affiliated reorganized debtors in the above-captioned proceeding (the "Post-Effective Date Debtors") and Alan Halperin, solely in his capacity as Claims Ombudsman (the "Claims Ombudsman" and together with the Post-Effective Date Debtors, the "Movants"), filed the *Post-Effective Date Debtors' and Claims Ombudsman's Fourth Joint Motion for Entry of an Order Extending the Claims Objection Deadline to September 8, 2026* ("Motion") with the United States Bankruptcy Court for the District of Delaware ("Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Motion must be in writing, in conformity with the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and filed with the Bankruptcy Court, so as to be received on or before **March 17, 2026 at 4:00 p.m. (ET) ("Objection Deadline")**. At the same time, you must also serve a copy of the response upon the Movant's undersigned counsel.

PLEASE TAKE FURTHER NOTICE THAT a hearing on the Motion will be held on **March 31, 2026 at 2:00 p.m. (ET) (the "Hearing Date")** before the Honorable Mary F. Walrath, United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom #4, Wilmington, Delaware 19801.

IF NO OBJECTIONS ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH SUCH PLEADINGS WITHOUT FURTHER NOTICE OR HEARING.

[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 Alex Matina, CEO, M 3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

Dated: March 3, 2026
Wilmington, Delaware

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EXHIBIT A

Proposed Order

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)
Reorganized Debtors.	(Jointly Administered)
	Re: Docket No. ____

ORDER EXTENDING THE CLAIMS OBJECTION DEADLINE TO SEPTEMBER 8, 2026

Upon the joint motion (the "Motion")[2] of the Post-Effective Date Debtors and Alan D. Halperin, solely in his capacity as Claims Ombudsman, for the entry of an order (this "Order") extending the deadline to object to Claims through and including September 8, 2026; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; venue being proper before this Court; consideration of the Motion and the relief requested being a core proceeding pursuant to 28 U.S.C. § 157(b); due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; the Court having found and determined that the relief sought in the Motion is in the best interests of the Post-Effective Date Debtors' estate, its creditors and all parties in interest, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

IT IS HEREBY ORDERED THAT:

1. That the Motion is GRANTED as set forth herein

[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 Alex Matina, CEO, M 3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

[2] Capitalized terms used, but not otherwise defined herein, shall have the meanings ascribed to such terms in the Motion.

2. That the Claims Objection Deadline shall be, and hereby is, extended through and including September 8, 2026 as to all Filed Claims, Scheduled Claims, and Administrative Claim Requests, including claims that are payable from the Administrative and Priority Claims Reserve; and it is further.

3. That this Order is without prejudice to the rights of the Post-Effective Date Debtors and the Claims Ombudsman to seek further extensions of the Claims Objection Deadline; and it is further.

4. That the Court shall retain jurisdiction to construe and enforce this Order.