IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
Stark Novus Financial Inc., *et al.*,[1]	Case No. 23-10831 (MFW)
Reorganized Debtors.	(Jointly Administered)
	Objection Deadline: September 15, 2026 at 4:00 p.m. (ET) **Hearing Date: September 22, 2026 at 10:30 a.m. (ET)**

POST-EFFECTIVE DATE DEBTORS' TENTH MOTION FOR ENTRY OF AN ORDER EXTENDING THE DEADLINE BY WHICH POST-EFFECTIVE DATE DEBTORS MAY FILE NOTICES TO REMOVE ACTIONS

Stark Novus Financial Inc. fka Nu Ride Inc.[2] and its affiliated reorganized debtors in the above-captioned proceeding (the "**Post-Effective Date Debtors**"), by and through their undersigned counsel, file this motion (the "**Motion**") pursuant to 28 U.S.C. § 1452, rules 9006(b) and 9027 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), and rule 9006-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "**Local Rules**") for entry of an order, substantially in the form attached as **Exhibit A** (the "**Proposed Order**"), approving the extension of the deadline by which the Post-Effective Date Debtors may remove actions. In support of this Motion, the Post-Effective Date Debtors state as follows:

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

[2] On the July 15, 2026, Nu Ride Inc. filed its form 8-K with the United States Securities and Exchange Commission reflecting its name change from Nu Ride Inc. to Stark Novus Financial Inc. See *Post-Effective Date Debtors' Motion for Entry of an Order Changing the Case Caption* [D.I. 1652].

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RELIEF REQUESTED

1. Pursuant to Bankruptcy Rule 9027(a)(2), the time period by which the Post-Effective Date Debtors may file notices of removal of claims and causes of action pursuant to 28 U.S.C. § 1452 was initially set to expire on September 25, 2023.[3] On May 14, 2026, the Post-Effective Date Debtors filed a *Ninth Motion for Entry of an Order Extending the Deadline By Which the Post-Effective Date Debtors May File Notices to Remove Actions* [D.I. 1635]. On June 1, 2026, the Bankruptcy Court entered an order approving this motion and extending the deadline to remove actions to September 11, 2026 ("**Removal Deadline**"). *See* D.I. 1641.

2. By this Motion, pursuant to 28 U.S.C. § 1452, Bankruptcy Rules 9006(b) and 9027, and Local Rule 9006-2, the Post-Effective Date Debtors request entry of an order extending the Removal Deadline by approximately 120 days, through and including January 11, 2027[4] with respect to all matters pending as of the Petition Date as specified in Bankruptcy Rule 9027(a)(2) (the "**Prepetition Actions**") in addition to any and all matters initiated after the Petition Date as specified in Bankruptcy Rule 9027(a)(3) (the "**Postpetition Actions**," together with the Prepetition Actions, the "**Actions**").[5]

3. The Post-Effective Date Debtors further request that the Order approving this Motion be entered without prejudice to (a) any position the Post-Effective Date Debtors may take regarding whether section 362 of title 11 of the United States Code (the "**Bankruptcy Code**") applies to stay any given Action, and (b) the right of the Post-Effective Date Debtors to seek further extensions of the Removal Deadline.

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[3] Bankruptcy Rule 9027(a)(2) provides that the time period will expire ninety (90) days from the Petition Date.

[4] One-hundred and twenty days from September 11, 2026 is January 9,2027, which is a Saturday.

[5] Pursuant to Local Rule 9006-2, the filing of this Motion prior to the expiration of the Removal Deadline automatically extends such deadline until such time as the Court rules on this Motion.

JURISDICTION, VENUE, AND PREDICATES FOR RELIEF

4. This Court has jurisdiction to consider this Motion under 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference*, dated February 29, 2012 (Sleet, C.J.). This is a core proceeding under 28 U.S.C. § 157(b). Venue of these Chapter 11 Cases (as defined below) and this Motion is proper in this District under 28 U.S.C. §§ 1408 and 1409.

5. The predicates for the relief requested by this Motion are 28 U.S.C. § 1452, section 105(a) of the Bankruptcy Code, Bankruptcy Rules 9006(b) and 9027, and Local Rule 9006-2.

6. Pursuant to Local Rule 9013-1(f), the Post-Effective Date Debtors consent to the entry of a final judgment or order with respect to this Motion if it is determined that this Court lacks Article III jurisdiction to enter such final order or judgment absent consent of the parties.

BACKGROUND

7. 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 (the "**Creditors Committee**") 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 (the "**Equity Committee**") pursuant to section 1102 of the Bankruptcy Code. [D.I. 375]. No trustee or examiner been appointed in these Chapter 11 Cases.

8. 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].

9. 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.[6]

BASIS FOR RELIEF REQUESTED

10. Section 1452 of title 28 of the United States Code and Bankruptcy Rule 9027 govern the removal of pending civil actions. Specifically, 28 U.S.C. § 1452(a) provides:

> A party may remove any claim or cause of action in a civil action other than a proceeding before the United States Tax Court or a civil action by a governmental unit to enforce such governmental unit's police or regulatory power, to the district court for the district where such civil action is pending, if such district court has jurisdiction of such claim or cause of action under section 1334 of this title.

28 U.S.C. § 1452(a).

11. Bankruptcy Rule 9027(a)(2) further provides, in pertinent part:

> If the claim or cause of action in a civil action is pending when a case under the [Bankruptcy] Code is commenced, a notice of removal may be filed only within the longest of (A) 90 days after the order for relief in the case under the [Bankruptcy] Code, (B) 30 days after entry of an order terminating a stay, if the claim or cause of action in a civil action has been stayed under § 362 of the [Bankruptcy] Code, or (C) 30 days after a trustee qualifies in a chapter 11 reorganization case but not later than 180 days after the order for relief.

[6] See Notice of Effective Date [D.I. 1096].

Fed. R. Bankr. P. 9027(a)(2).

12. With respect to post-petition actions, Bankruptcy Rule 9027(a)(3) provides that a notice of removal may be filed:

> only within the shorter of (A) 30 days after receipt, through service or otherwise, of a copy of the initial pleading setting forth the claim or cause of action sought to be removed, or (B) 30 days after receipt of the summons if the initial pleading has been filed with the court but not served with the summons.

Fed. R. Bankr. P. 9027(a)(3).

13. Bankruptcy Rule 9006(b) provides that the Court may extend unexpired time periods, such as the Removal Deadline, without notice:

> [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).

14. It is well settled that this Court is authorized to extend, for cause, the removal period provided under 28 U.S.C. § 1452 and Bankruptcy Rule 9027. *See Pacor, Inc. v. Higgins*, 743 F.2d 984, 996 n.17 (3d Cir. 1984), *overruled on other grounds by, Things Remembered, Inc. v. Petrarca*, 516 U.S. 124, 134-35 (1995) (holding that the bankruptcy court's power to grant an extension of the removal period pursuant to Bankruptcy Rule 9006(b) is "clear"); *see also In re TK Holdings Inc.*, 2018 WL 1306271, at *46 (Bankr. D. Del. Mar. 18, 2010) (extending the time provided by Bankruptcy Rule 9027 to remove a civil action under 28 U.S.C. § 1452); *In re The Hertz Corp. et al.*, Case No. 20-11218 (MFW) (Bankr. D. Del. Aug. 10, 2020) (extending the removal period by 120 days without prejudice to right of debtors to seek further extensions); *In re PWM Property Management LLC, et al.*, Case No. 21-11445 (MFW) (Bankr. D. Del. Feb. 3, 2022) (same); *In re*

Virgin Orbit Holdings, Inc. et al., Case No. 23-10405 (KBO) (Bankr. D. Del. July 18, 2023) (same).

15. The Post-Effective Date Debtors submit that ample cause exists to extend the Removal Deadline. While the Post-Effective Date Debtors do not currently believe there are any Actions that need to be removed, the Post-Effective Date Debtors and their professionals have not yet had the opportunity to properly consider, or make decisions concerning, all Actions currently pending. Therefore, the Post-Effective Date Debtors believe that it is prudent to seek an extension of the Removal Deadline to preserve the rights of the Post-Effective Date Debtors and their estates to potentially remove any Actions, if necessary.

16. Given the Post-Effective Date Debtors' focus to date, the Post-Effective Date Debtors have not had sufficient time to evaluate any pending Actions and possible removal pursuant to Bankruptcy Rule 9027(a). Accordingly, the Post-Effective Date Debtors believe the current Removal Deadline of September 11, 2026 would not provide sufficient time for the Post-Effective Date Debtors to determine conclusively which Actions, if any, they should seek to remove. The extension sought will afford the Post-Effective Date Debtors an opportunity to make more fully-informed decisions concerning the existence of any Actions and their removal, and will ensure that the Post-Effective Date Debtors and their estates do not forfeit the valuable rights afforded to them under 28 U.S.C. § 1452. Absent the requested extension, the Post-Effective Date Debtors will not be able to complete this review adequately, and the result could, among other things, unnecessarily hinder the Post-Effective Date Debtors' ability to recover assets for the benefit of their estates. Furthermore, the Post-Effective Date Debtors submit that granting the extension requested herein will not prejudice the rights of any adversary in an existing Action because such parties are prevented from prosecuting Actions absent relief from the automatic stay.

In addition, nothing herein will prejudice any party to an existing Action that the Post-Effective Date Debtors may ultimately attempt to remove from seeking the remand of such action under 28 U.S.C.§ 1452(b) at the appropriate time.

17. For the reasons set forth above, the Post-Effective Date Debtors submit that extending the current Removal Deadline through and including January 11, 2027 is necessary, prudent, and in the best interests of the Post-Effective Date Debtors, their estates, and creditors.

NOTICE

18. Notice of this Motion has been provided to the following parties, or, in lieu thereof, their counsel: (i) the U.S. Trustee; (ii) counsel to Foxconn; (iii) counsel to the Creditors Committee, (iv) the Internal Revenue Service; (v) the Securities and Exchange Commission; (vi) the United States Attorney for the District of Delaware; (vii) the state attorneys general for all states in which the Debtors conduct business; (viii) any parties who have asserted liens against the Debtors' assets; (ix) any party affected by the Motion; and (x) any such other party entitled to receive notice pursuant to Bankruptcy Rule 2002 and Local Rule 2002-1(b). The Post-Effective Date Debtors submit that, in view of the facts and circumstances, such notice is sufficient, and no other or further notice need be provided.

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WHEREFORE, for the reasons set forth herein, the Post-Effective Date Debtors respectfully request that the Court grant the relief requested in this Motion and such other and further relief as is just and proper.

Dated: September 1, 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
Stark Novus Financial Inc., *et al.*,[1]	Case No. 23-10831 (MFW)
Reorganized Debtors.	(Jointly Administered)
	Objection Deadline: September 15, 2026 at 4:00 p.m. (ET) **Hearing Date: September 22, 2026 at 10:30 a.m. (ET)**

NOTICE OF POST-EFFECTIVE DATE DEBTORS' TENTH MOTION FOR ENTRY OF AN ORDER EXTENDING THE DEADLINE BY WHICH POST-EFFECTIVE DATE DEBTORS MAY FILE NOTICES TO REMOVE ACTIONS

PLEASE TAKE NOTICE that on September 1, 2026, Stark Novus Financial Inc. fka Nu Ride Inc. and its affiliated reorganized debtors in the above-captioned proceeding (the "**Post-Effective Date Debtors**"), filed the *Post-Effective Date Debtors' Tenth Motion for Entry of an Order Extending the Deadline by Which Post-Effective Date Debtors May File Notices to Remove Actions* (the "**Motion**") with the United States Bankruptcy Court for the District of Delaware (the "**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 United States Bankruptcy Court for the District of Delaware, filed with the Bankruptcy Court as to be received on or before **September 15, 2026 at 4:00 p.m. (ET) (the "Objection Deadline").** At the same time, you must also serve a copy of the response upon the Post-Effective Date Debtors' undersigned counsel.

PLEASE TAKE FURTHER NOTICE THAT a hearing on the Motion 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 will be held on **September 22, 2026 at 10:30 a.m. (ET) (the "Hearing Date").**

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

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

Dated: September 1, 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
Stark Novus Financial Inc., *et al.*, [1]	Case No. 23-10831 (MFW)
Reorganized Debtors.	(Jointly Administered)
	Re: Docket No. ___

ORDER EXTENDING THE DEADLINE BY WHICH POST-EFFECTIVE DATE DEBTORS MAY FILE NOTICES TO REMOVE ACTIONS

Upon the motion (the "**Motion**")[2] of the Post-Effective Date Debtors for the entry of an order (this "**Order**"), pursuant to section 105(a) of the Bankruptcy Code, Bankruptcy Rules 9006(b) and 9027, and Local Rule 9006-2, extending the period within which the Post-Effective Date Debtors may remove actions pursuant to 28 U.S.C. § 1452 through and including January 11, 2027; and it appearing that this Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012 (Sleet, C.J.); and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due, sufficient, and proper notice of the Motion having been provided under the circumstances and in accordance with the Bankruptcy Rules and the Local Bankruptcy Rules, and it appearing that no other or further notice need be provided; and a hearing having been held, if necessary, to consider the relief requested in the Motion (the "**Hearing**"); and upon consideration of the record

[1] The Reorganized Debtors and the last four digits of their respective taxpayer identification numbers are: Stark Novus Financial Inc. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Reorganized Debtors' service address is: Stark Novus Financial 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.

of all of the proceedings had before the Court; and the Court having found and determined 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 ORDERED THAT:

1. The Motion is GRANTED as set forth herein.

2. The Removal Deadline is extended through and including January 11, 2027 pursuant to Bankruptcy Rule 9006.

3. The Post-Effective Date Debtors are authorized to take all reasonable actions necessary or appropriate to effectuate the relief granted in this Order.

4. This Order shall be without prejudice to (i) any position the Post-Effective Date Debtors may take regarding whether section 362 of the Bankruptcy Code applies to stay any litigation pending against the Post-Effective Date Debtors, or (ii) the Post-Effective Date Debtors' right to seek a further extension of the Removal Deadline.

5. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the enforcement of this Order.