Docket #1661 Date Filed: 09/17/2026

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. 1658

CERTIFICATE OF NO OBJECTION REGARDING 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 undersigned counsel hereby certifies as follows:

On September 1, 2026, Stark Novus Financial Inc. and its affiliated reorganized debtors in the above-captioned proceeding (the "Post-Effective Date Debtors"), by and through their undersigned counsel, 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") [Docket No. 1658] (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court").

The deadline to object to the Motion was September 15, 2026, at 4:00 p.m. (ET).

The undersigned further certifies that after reviewing the Court's docket in this case, no formal answer, objection, or other responsive pleading to the Motion appears thereon. The Post-Effective Date Debtors respectfully request that the Court enter the Order attached to the Motion, and attached hereto as **Exhibit A**.

[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.

2310831260917000000000002

Dated: September 17, 2026
Wilmington, Delaware

MORRIS JAMES LLP

/s/ Tara Pakrouh Evans
Eric J. Monzo (DE Bar No. 5214)
Tara Pakrouh Evans (DE Bar No. 6192)
3205 Avenue North Blvd., Suite 100
Wilmington, DE 19803
Telephone: (302) 888-6800
Facsimile: (302) 571-1750
E-mail: emonzo@morrisjames.com
tevans@morrisjames.com

-and-

BROWN RUDNICK LLP
Robert J. Stark (admitted *pro hac vice*)
Bennett S. Silverberg (admitted *pro hac vice*)
Michael S. Winograd (admitted *pro hac vice*)
7 Times Square
New York, NY 10036
Telephone: (212) 209-4800
Facsimile: (212) 209-4801
E-mail: rstark@brownrudnick.com
bsilverberg@brownrudnick.com
mwinograd@brownrudnick.com

-and-

Sharon I. Dwoskin (admitted *pro hac vice*)
One Financial Center
Boston, MA 02111
Telephone: (617) 856-8200
Facsimile: (617) 856-8201
E-mail: sdwoskin@brownrudnick.com

Counsel to the Post-Effective Date Debtors

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. 1658

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.