

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

CTN Holdings, Inc., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10603 (TMH)

(Jointly Administered)

Related Docket Nos. 7 & 55

**CERTIFICATE OF NO OBJECTION REGARDING DEBTORS' MOTION FOR ENTRY  
OF AN ORDER AUTHORIZING THE DEBTORS TO REJECT AN UNEXPIRED LEASE  
OF NONRESIDENTIAL REAL PROPERTY AND ABANDON PERSONAL PROPERTY  
EFFECTIVE AS OF THE PETITION DATE**

The undersigned hereby certifies that, as of the date hereof, he has received no answer, objection or other responsive pleading to the *Debtors' Motion for Entry of an Order Authorizing the Debtors to Reject an Unexpired Lease of Nonresidential Real Property and Abandon Personal Property Effective as of the Petition Date* [Docket No. 7] (the "Motion") filed by the Debtors. The undersigned further certifies that he has reviewed the Court's docket in this proceeding and no answer or other responsive pleading to the Motion appears thereon.

Pursuant to the *Notice of Hearing to Motion for Entry of an Order Authorizing the Debtors to Reject an Unexpired Lease of Nonresidential Real Property and Abandon Personal Property Effective as of the Petition Date* [Docket No. 55], responses to the Motion were to be filed and served no later than April 23, 2025 at 4:00 p.m. (the "Objection Deadline"). The Objection

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are CTN Holdings, Inc. (9122); CTN SPV Holdings, LLC (8689); Catona Climate Solutions, LLC (3375); Make Earth Green Again, LLC (4441); Aspiration QFZ, LLC (1532); Zero Carbon Holdings, LLC (1679); Aspiration Fund Adviser, LLC (4214). The Debtors' mailing address is 548 Market Street, PMB 72015, San Francisco, CA 94104-5401.



2510603250430000000000008

Deadline was extended to April 24, 2025, for the Official Committee of Unsecured Creditors and the Office of the United States Trustee.

**WHEREFORE**, the Debtors respectfully request that the proposed form of order attached hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

Dated: April 30, 2025  
Wilmington, Delaware

Respectfully submitted,

/s/ William F. Taylor, Jr.

**WHITEFORD, TAYLOR & PRESTON LLC<sup>2</sup>**

William F. Taylor, Jr. (DE No. 2936)  
Bradley P. Lehman (DE No. 5921)  
600 North King Street, Suite 300  
Wilmington, Delaware 19801  
Telephone: (302) 353-4144  
Facsimile: (302) 661-7950  
Email: wtaylor@whitefordlaw.com  
blehman@whitefordlaw.com

**WHITEFORD, TAYLOR & PRESTON, L.L.P.**

David W. Gaffey (admitted *pro hac vice*)  
Brandy M. Rapp (admitted *pro hac vice*)  
J. Daniel Vorsteg (admitted *pro hac vice*)  
Joshua D. Stiff (admitted *pro hac vice*)  
Alexandra G. DeSimone (admitted *pro hac vice*)  
3190 Fairview Park Drive, Suite 800  
Falls Church, Virginia 22042-4510  
Telephone: (703) 280-9260  
Email: dgaffey@whitefordlaw.com  
brapp@whitefordlaw.com  
jdvorsteg@whitefordlaw.com  
jstiff@whitefordlaw.com  
adesimone@whitefordlaw.com

*Proposed Counsel to the Debtors and Debtors in Possession*

---

<sup>2</sup> Whiteford, Taylor & Preston operates as Whiteford, Taylor & Preston LLC in Delaware.

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

CTN HOLDINGS, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10603 (TMH)

(Jointly Administered)

Related Docket Nos. 7, 55 & \_\_\_\_

**ORDER AUTHORIZING THE DEBTORS TO REJECT  
AN UNEXPIRED LEASE OF NONRESIDENTIAL REAL  
PROPERTY AND ABANDON CERTAIN PERSONAL  
PROPERTY AS OF THE PETITION DATE**

Upon the motion (the “Motion”)<sup>2</sup> of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) for entry of an order (this “Order”), pursuant to sections 105(a), 365, and 554 of the Bankruptcy Code and Bankruptcy Rules 6006 and 6007; and this Court having jurisdiction over this matter 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 February 9, 2012, and this Court having found that this a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and this Court having authority to enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and this Court having found that the Debtors’ notice of the

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of the Debtors’ federal tax identification numbers, are CTN Holdings, Inc. (9122), CTN SPV Holdings, LLC (8689), Make Earth Green Again, LLC (4441), Aspiration QFZ, LLC (1532), Aspiration Fund Adviser, LLC (4214), Catona Climate Solutions, LLC (3375) and Zero Carbon Holdings, LLC (1679). The mailing address for the Debtors is 548 Market Street, PMB 72015, San Francisco, CA 94104-5401.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Motion.

Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at any hearing before this Court; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; 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 Debtors are authorized to reject the Lease as defined in the Motion, and such Lease is hereby deemed rejected pursuant to 11 U.S.C. § 365 as of the Petition Date (the “Rejection Date”).
3. The Debtors are authorized to abandon any and all Personal Property located at the Property, and such abandoned Personal Property is deemed abandoned to the Landlord pursuant to 11 U.S.C. § 554 as of the Petition Date.
4. The Landlord shall have thirty (30) days from the later of (i) the Rejection Date and (ii) the deadline for filing non-governmental proofs of claims in the Chapter 11 Cases to file a claim for any damages it believes it has incurred resulting from the rejection of the Lease.
5. The terms of this Order are immediately effective and enforceable upon its entry.
6. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.