IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

) Chapter 11
In re:)
) Case No. 25-10603 (TMH)
CTN HOLDINGS, INC. et al, ¹)
) (Jointly Administered)
Debtors.)
)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF NOTICES AND PAPERS

PLEASE TAKE NOTICE that the undersigned hereby appear on behalf of Tri-Gen Investments, LP ("<u>Tri-Gen</u>"), in the above-captioned chapter 11 cases. Pursuant to section 1109(b) of title 11 of the United States Code (the "<u>Bankruptcy Code</u>") and Rules 2002, 3017(a), 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the "<u>Bankruptcy Rules</u>"), the undersigned respectfully request that all notices and papers filed or entered in these cases be given to and served upon the following:

Evelyn J. Meltzer

TROUTMAN PEPPER LOCKE LLP

Hercules Plaza, Suite 1000

1313 N. Market Street, P.O. Box 1709

Wilmington, DE 19899-1709

Telephone: (302) 777-6500

Email: evelyn.meltzer@troutman.com

Sean A. Feener
TROUTMAN PEPPER LOCKE LLP
875 Third Avenue
New York, New York 10022
Telephone: (212) 704-6000

Email: sean.feener@troutman.com

PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any orders, notices,

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.



applications, motions, petitions, pleadings, complaints, demands, disclosure statements, plans of reorganization, or requests, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, electronic mail, hand delivery, telephone, electronic filing, facsimile, or otherwise, in the above-referenced cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither the filing of this *Notice of Appearance* and Request for Service of Notices and Papers (this "Notice") nor any later appearance, pleading, proof of claim, claim, or suit shall be deemed, or construed to constitute, a waiver of any substantive or procedural right of Tri-Gen, including, without limitation: (i) the right to have an Article III judge adjudicate in the first instance any case, proceeding, matter or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the United States Constitution, (ii) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (iii) the right to trial by jury in any proceeding triable in these cases or any case, controversy, or proceeding related to these cases, (iv) the right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, (v) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice, (vi) any election of remedy, or (vii) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: May 7, 2025

Wilmington Delaware

TROUTMAN PEPPER LOCKE LLP

/s/ Evelyn J. Meltzer

Evelyn J. Meltzer (DE No. 4581) Hercules Plaza, Suite 1000 1313 N. Market Street, P.O. Box 1709 Wilmington, DE 19899-1709 Telephone: (302) 777-6500

Email: evelyn.meltzer@troutman.com

-and-

Sean A. Feener (*pro hac vice* forthcoming) 875 Third Avenue New York, New York 10022 Telephone: (212) 704-6000

Email: sean.feener@troutman.com

Counsel to Tri-Gen Investments, LP

CERTIFICATE OF SERVICE

I, Evelyn J. Meltzer hereby certify that on the 7th day of May 2025, I caused the foregoing *Notice of Appearance and Request for Service of Notices and Papers* to be served by email upon the parties set forth below, and all ECF participants registered in this case were served electronically on the date of filing through the court's ECF system at their respective email addresses registered with the court.

(Proposed Counsel to the Debtors)
William F. Taylor, Jr.
Whiteford, Taylor & Preston LLC
600 North King Street, Suite 300
Wilmington, Delaware 19801
wtaylor@whitefordlaw.com

(Proposed Counsel to the Official Committee of Unsecured Creditors)
Katharina Earle
GIBBONS P.C.
300 Delaware Avenue, Suite 1015
Wilmington, Delaware 19801-1671
kearle@gibbonslaw.com

Rosa Sierra-Fox Office of the United States Trustee U. S. Department of Justice 844 King Street, Suite 2207 Lockbox #35 Wilmington, DE 19801 rosa.sierra@usdoj.gov (Proposed Counsel to the Debtors)
David W. Gaffey and Brandy M. Rapp
Whiteford, Taylor & Preston L.L.P.
3190 Fairview Park Drive
Suite 800
Falls Church, VA 22042-4510
dgaffey@whitefordlaw.com
brapp@whitefordlaw.com

(Proposed Counsel to the Official Committee of Unsecured Creditors)

Kyle P. McEvilly
GIBBONS P.C.
One Gateway Center
Newark, New Jersey 07102-5310
rmalone@gibbonslaw.com
btheisen@gibbonslaw.com
kmcevilly@gibbonslaw.com

/s/ Evelyn J. Meltzer

Evelyn J. Meltzer (DE No. 4581)