

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

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

**TRI-GEN INVESTMENTS, LP’S WITNESS AND EXHIBIT LIST
FOR HEARING SCHEDULED FOR MAY 12, 2025, AT 11:00 A.M. (ET)**

Tri-Gen Investments, LP (“Tri-Gen”), files this witness and exhibit list (the “List”) identifying the witnesses Tri-Gen may call and the exhibits the Tri-Gen may introduce into evidence at the hearing to be held on May 12, 2025, at 11:00 a.m. (E.T.) (the “Hearing”) before the Honorable Thomas M. Horan, at the United States Bankruptcy Court for the District of Delaware, located at 824 North Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801.

WITNESSES

1. Tri-Gen may call the following witness at the Hearing:
 - a. **Travis Ahlstrom** (Chief Investment Officer of Tri-Gen Investments, LP).
2. Tri-Gen cross designates all witnesses designated by any other party in connection with the Hearing. Tri-Gen reserves the right to supplement or amend the List and to identify additional witnesses, including any necessary rebuttal or impeachment witnesses, prior to the conclusion of the Hearing. Tri-Gen also reserves the right to call any witness or submit any

¹ 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.



declaration necessary to establish the authenticity or admissibility of documents, call any witness identified by any other party (for any purposes, including for direct testimony), and cross examine any witness called by another party.

EXHIBITS

3. Tri-Gen designates the following exhibits that may be used at the Hearing:

Exhibit No.	Description	ECF No.
1.	Senior Secured Promissory Note and Guaranty Originally Issued on March 12, 2021	n/a
2.	First Amended and Restated Senior Secured Promissory Note and Guaranty, dated as of July 23, 2021	n/a
3.	Second Amended and Restated Senior Secured Promissory Note and Guaranty, dated as of December 15, 2021	n/a
4.	Third Amended and Restated Senior Secured Promissory Note and Guaranty, dated October 30, 2024 (the "Third PN")	n/a
5.	First Amendment to the Third PN dated as of December 30, 2024	n/a
6.	Second Amendment to the Third PN dated as of March 11, 2025	n/a
7.	Third Amendment to the Third PN dated as of March 24, 2025	n/a
8.	Pledge and Security Agreement dated May 12, 2021	n/a
9.	First Amendment to Pledge and Security Agreement, dated as of October 30, 2024	n/a
10	First Forbearance Agreement and Limited Waiver, dated as of December 9, 2022	n/a
11	First Amendment and Limited Waiver to Forbearance Agreement, dated as of February 7, 2023	n/a
12	Assignment of \$2.75 Million Secured Promissory Note of Aspiration Partners, Inc., dated April 30, 2023	126

4. Tri-Gen also cross designates all exhibits designated by any other party in connection with the Hearing and reserves the right to use additional exhibits for rebuttal or impeachment purposes.

5. Tri-Gen reserves the right to amend or supplement this witness and exhibit list prior to the Hearing.

Respectfully submitted,

May 7, 2025
Wilmington, DE

/s/ Evelyn J. Meltzer

Evelyn J. Meltzer (DE No. 4581)

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-and-

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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 *Tri-Gen Investments, LP's Witness and Exhibit List for Hearing Scheduled for May 12, 2025, at 11:00 a.m. (ET)* to be served by email upon the parties set forth on the attached list; 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.

/s/ Evelyn J. Meltzer
Evelyn J. Meltzer (DE No. 4581)

**CTN Holdings 25-10603-TMH
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