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

In re:

CTN Holdings, Inc., et al.,

Debtors.

In re:

Carbon Sequestration III, LLC,

Debtor.

Chapter 11

Case No. 25-10603 (TMH)

(Jointly Administered)

Hearing Date: May 28, 2025 at 3:00 p.m. (ET) Objection Deadline: May 27, 2025 at 4:00 p.m. (ET)

Related Docket Nos. 217, 218 & 219

Chapter 11

Case No. 25-10918 (TMH)

(Joint Administration Requested)

Hearing Date: May 28, 2025 at 3:00 p.m. (ET)

Objection Deadline: May 27, 2025 at 4:00 p.m. (ET)

Related Docket Nos. 3, 4 & 5

## NOTICE OF HEARING OF DEBTORS' SUPPLEMENTAL MOTION FOR ENTRY OF AN ORDER DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES

PLEASE TAKE NOTICE that on May 22, 2025, the debtors and the debtors-inpossession in the above-captioned case (collectively, the "Debtors") filed Debtors' Supplemental Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases [Docket No. 217] (the "Supplemental Motion") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that on May 22, 2025, the Debtor filed the Debtors' Motion for Entry of an Order Shortening Notice and Scheduling an Expedited Hearing with Respect to Debtors' Supplemental Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases [Docket No. 218] (the "Motion to Shorten Notice").

PLEASE TAKE FURTHER NOTICE that on May 23, 2025, the Bankruptcy Court entered the Order Shortening Notice and Scheduling an Expedited Hearing with Respect to Debtors' Supplemental Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases (the "Order") [Docket No. 219]. A copy of the Order is attached hereto as Exhibit A.



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PLEASE TAKE FURTHER NOTICE that a hearing on the Supplemental Motion will

be held before the Honorable Thomas M. Horan at the Bankruptcy Court, 824 Market Street, 5<sup>th</sup>

Floor, Courtroom No. 5, Wilmington, Delaware 19801 on May 28, 2025 at 3:00 p.m. (Eastern

**Time**) (the "Hearing").

PLEASE TAKE FURTHER NOTICE that any objections to the Supplemental Motion

must be filed with the United States Bankruptcy for the District of Delaware, 824 Market Street,

3<sup>rd</sup> Floor, Wilmington, Delaware 19801, and be served upon the undersigned, on or before **May** 

27, 2025 at 4:00 p.m. (Eastern Time) (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that if no objection or other response to the

Supplemental Motion is timely filed in accordance with the procedures set forth above, the

Bankruptcy Court may enter an Order granting the relief sought in the Supplemental Motion

without further notice or hearing.

Dated: May 23, 2025

Wilmington, Delaware

Respectfully submitted,

/s/ Bradley P. Lehman

WHITEFORD, TAYLOR & PRESTON LLC<sup>1</sup>

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<sup>1</sup> Whiteford, Taylor & Preston operates as Whiteford, Taylor & Preston LLC in Delaware.

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-and-

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

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Counsel to the Debtors and Debtors in Possession

# **EXHIBIT A**

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

in re:	
CTN Holdings, Inc., et al., <sup>1</sup>	Chapter 11
Debtors.	Case No. 25-10603 (TMH)
	(Jointly Administered)
	Related Docket Nos. 217 & 218
In re:	
Carbon Sequestration III, LLC,	Chapter 11
•	Case No. 25-10918 (TMH)
Debtor.	
	(Joint Administration Requested
Employer Tax I.D. No. 88-1182344	
	Related Docket Nos. 3 & 4

## ORDER SHORTENING NOTICE AND SCHEDULING AN EXPEDITED HEARING WITH RESPECT TO DEBTORS' SUPPLEMENTAL MOTION FOR ENTRY OF AN ORDER DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES

Upon the Debtors' Motion for Entry of an Order Shortening Notice and Scheduling an Expedited Hearing with Respect to Debtors' Supplemental Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases (the "Motion to Shorten")<sup>2</sup> of the Debtors for entry of an order (the "Order") shortening notice of the Debtors' Supplemental Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases [Docket Nos. 217 and 3] (the "Motion") requesting approval of a hearing on the Motion, the Court having reviewed the Motion to Shorten and found that the relief requested therein is justified under the circumstances,

Defined terms not otherwise defined herein shall have the meaning or meanings ascribed thereto in the Motion to Shorten or the Motion, as applicable.



<sup>&</sup>lt;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.

#### IT IS HEREBY ORDERED THAT:

- 1. The Motion to Shorten is **GRANTED**.
- 2. The Motion will be considered at the hearing scheduled for **May 28, 2025 at 3:00 PM (ET)**.
- 3. Objections, if any, to the relief requested in the Motion must be filed and served so as to be received by the Debtors by no later than **May 27, 2025 at 4:00 p.m.** (ET).
  - 4. This Court retains jurisdiction to construe and enforce the terms of this Order.

Dated: May 23rd, 2025 Wilmington, Delaware

THOMAS M. HORAN
UNITED STATES BANKRUPTCY JUDGE