

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

In re:

CTN HOLDINGS, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10603 (TMH)

(Jointly Administered)

In re:

CARBON SEQUESTRATION III, LLC,

Debtor.

Chapter 11

Case No. 25-10918 (TMH)

(Joint Administration Requested)

**NOTICE OF AGENDA FOR HEARING
SCHEDULED FOR MAY 28, 2025 AT 3:00 P.M.
(EASTERN TIME)**

**THIS HEARING WILL TAKE PLACE IN COURTROOM #5, 5TH FLOOR
824 MARKET STREET, WILMINGTON, DELAWARE.**

Please refer to Judge Horan's Chambers Procedures and the Court's website (<https://www.deb.uscourts.gov/ecourt-appearances>) for information on the method of allowed participation (video or audio), Judge Horan's expectations of remote participants, and the advance registration requirements. Registration is required by May 27, 2025 at 4:00 p.m. (Eastern Time) using the eCourt Appearances tool ([available here](#)) available on the Court's website.

After registering your appearance, you will receive a confirmation email. Zoom information will be sent out prior to the hearing.

I. MATTER GOING FORWARD:

1. Kijani Forestry, PBC's Motion for an Order Clarifying the Automatic Stay Does Not Apply to Kijani Forestry, PBC's Forward Purchase Agreement Under Section 556 of the Bankruptcy Code [[Docket No. 134](#); filed May 8, 2025]

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.



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Objection Deadline: May 22, 2025 at 4:00 p.m. (ET)

Reply Deadline: May 28, 2025 at 10:00 a.m. (ET)

Objections Received: Inherent Group, LP's Limited Objection and Reservation of Rights Regarding Kijani Forestry, PBC's Motion for an Order Clarifying the Automatic Stay Does Not Apply to Kijani Forestry, PBC's Forward Purchase Agreement Under Section 556 of the Bankruptcy Code [[Docket No. 216](#); filed May 22, 2025]

Related Documents:

- a. Kijani Forestry, PBC's Motion to Reschedule Hearing with Respect to Kijani Forestry, PBC's Motion for an Order Clarifying the Automatic Stay Does Not Apply to Kijani Forestry, PBC's Forward Purchase Agreement Under Section 556 of the Bankruptcy Code [[Docket No. 191](#); filed May 19, 2025]
- b. Kijani Forestry, PBC's Motion for Entry of an Order Shortening Notice with Respect to Kijani Forestry, PBC's Motion to Reschedule Hearing with Respect to Kijani Forestry, PBC's Motion for an Order Clarifying the Automatic Stay Does Not Apply to Kijani Forestry, PBC's Forward Purchase Agreement Under Section 556 of the Bankruptcy Code [[Docket No. 192](#); filed May 19, 2025]
- c. Declaration of Beau Milliken in Support of Kijani Forestry, PBC's Cure Objection, Motion to Reschedule Hearing and Motion to Shorten [[Docket No. 193](#); filed May 19, 2025]
- d. Notice of Intent to Serve Subpoena in a Bankruptcy Case on Carbon Capital Deployment I, LLC [[Docket No. 194](#); filed May 19, 2025]
- e. Certification of Counsel Regarding Kijani Forestry, PBC's Motion to Reschedule Hearing with Respect to Kijani Forestry, PBC's Motion for an Order Clarifying the Automatic Stay Does Not Apply to Kijani Forestry, PBC's Forward Purchase Agreement Under Section 556 of the Bankruptcy Code [[Docket No. 202](#); filed May 20, 2025]
- f. Order Rescheduling the Hearing on Kijani Forestry, PBCs Motion for an Order Clarifying the Automatic Stay Does Not Apply to Kijani Forestry, PBCs Forward Purchase Agreement Under Section 556 of the Bankruptcy Code [[Docket No. 205](#); entered May 20, 2025]
- g. Notice of Rescheduled Hearing Regarding Kijani Forestry, PBC's Motion for an Order Clarifying the Automatic Stay Does Not Apply to Kijani Forestry, PBC's Forward Purchase Agreement Under Section 556 of the Bankruptcy Code [[Docket No. 206](#); filed May 20, 2025]

Status: This matter is going forward.

II. MOTION ON SHORTENED NOTICE:

2. Debtors' Supplemental Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases [[Docket Nos. 217](#) and [3](#); filed May 22, 2025]

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

Objections Received: None to date.

Related Documents:

- a. Carbon Sequestration III, LLC Petition (Case No. 25-10918) [[Docket No. 1](#); filed May 22, 2025]
- b. 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 Nos. 218](#) and [4](#); filed May 22, 2025]
- c. 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 Nos. 219](#) and [5](#); entered May 23, 2025]
- d. Notice of Hearing of Debtors' Supplemental Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases [[Docket Nos. 220](#) and [6](#); filed May 23, 2025]

Status: This matter is going forward.

Dated: May 23, 2025
Wilmington, Delaware

Respectfully submitted,

/s/ Bradley P. Lehman

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² Whiteford, Taylor & Preston operates as Whiteford, Taylor & Preston LLC in Delaware.

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