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)

APPLICATION FOR ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF DUNDON ADVISERS LLC AS FINANCIAL ADVISORS FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF CTN HOLDINGS, INC., ET AL. NUNC PRO TUNC TO APRIL 14, 2025

The Official Committee of Unsecured Creditors (the "Committee") of CTN Holdings, Inc., and its affiliated debtors and debtors-in-possession (collectively, the "Debtors") in the above-captioned cases (the "Cases"), hereby submits this application (the "Application") for entry of an order, substantially in the form attached hereto as Exhibit A, authorizing and approving the retention and employment of Dundon Advisers LLC ("Dundon") as financial advisor to the Committee in connection with these Cases, effective as of April 14, 2025, pursuant to sections 328 and 1103 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Local Rule 2014-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"). In support of the Application, the Committee submits the declaration of Joshua Nahas (the "Nahas Declaration"), a managing director of Dundon, attached hereto as Exhibit B and incorporated

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.

herein by reference. In further support of the Application, the Committee respectfully states as follows:

JURISDICTION AND VENUE

- 1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
- 2. Venue in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief sought herein are sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1.

BACKGROUND

- 3. On March 30, 2025 (the "<u>Petition Date</u>"), the Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware.
- 4. The Debtors continue to manage and operate their businesses as debtors-in-possession under sections 1107 and 1108 of the Bankruptcy Code. No Trustee or examiner has been requested or appointed in these Cases.
- 5. On April 10, 2025, the Office of the United States Trustee (the "<u>U.S. Trustee</u>") filed the *Notice of Appointment of Official Committee of Unsecured Creditors* (the "<u>Appointment Notice</u>") [Docket No. 59].
 - 6. On April 14, 2025, the Committee selected Dundon to serve as its financial advisor.

SERVICES TO BE RENDERED

7. Dundon will provide such financial advisory services to the Committee as the Committee deems appropriate and feasible in order to advise the Committee in the course of the Chapter 11 Cases, including, but not limited to, the following:

- Assist in the analysis, review, and monitoring of the restructuring process, including, but not limited to, an assessment of the unsecured claims pool and potential recoveries for unsecured creditors;
- Assist in the sales process for the assets of the Debtors;
- Develop a complete understanding of the Debtors' businesses and their valuations;
- Determine whether there are viable alternative paths for the disposition of the Debtors' assets from those currently or in the future proposed by any Debtor;
- Assist the Committee in identifying, valuing, and pursuing estate causes of action, including, but not limited to, relating to prepetition transactions, control person liability, and lender liability;
- Advise the Committee in negotiations with the Debtors and certain of the Debtors' lenders;
- Assist the Committee in reviewing the Debtors' financial reports including, but not limited to, statements of financial affairs, schedules of assets and liabilities, cash budgets, and monthly operating reports
- Review and provide analysis of the present and any subsequently proposed debtorin-possession financing or use of cash collateral;
- Assist the Committee in evaluating and analyzing avoidance actions, including fraudulent conveyances and preferential transfers;
- Assist the Committee in investigating whether there are any unencumbered assets at any Debtor entity;
- Attend meetings and assist in discussions with the Committee, the Debtors, the secured lenders, the U.S. Trustee and other parties in interest and professionals;
- Present at meetings of the Committee, as well as meetings with other key stakeholders and parties;
- Perform such other advisory services for the Committee as may be necessary or proper in these proceedings, subject to the aforementioned scope.
- 8. The Committee has informed Dundon, and Dundon understands, that the Committee is planning on filing retention applications for other professionals in these Cases. In particular, the Committee determined that it was in the creditors' best interest to retain Gibbons P.C. as counsel to the Committee effective as of April 13, 2025.

PROFESSIONAL FEES AND COMPENSATION

9. Subject to this Court's approval, and in accordance with sections 330 and 331 of the Bankruptcy Code and any orders of the Court, Dundon will charge for its services as financial advisor to the Committee on an hourly basis in accordance with its ordinary and customary hourly rates in effect on the date such services are rendered, and for its actual, reasonable and necessary out-of-pocket disbursements incurred in connection therewith, as set forth in the Nahas Declaration. The current hourly rates of Dundon professionals are:²

<u>Title</u>	Rate Per Hour
Principal	\$960
Managing Director	\$850
Senior Advisor	\$850
Senior Director	\$755
Director	\$700
Associate Director	\$590
Senior Associate	\$485
Associate	\$350

10. The Committee is advised that Dundon intends to apply to this Court for allowance of compensation and reimbursement of expenses in accordance with applicable provisions of the Bankruptcy Code, the applicable Bankruptcy Rules, the Local Rules, and further orders of this Court, including any order providing for interim compensation of professionals. Dundon will maintain detailed records of fees and expenses incurred in connection with the rendering of the professional services described above, in accordance with applicable rules and guidelines.

As set forth in the Nahas Declaration, pursuant to its ordinary practice, Dundon generally revises its rates on an annual basis. The next scheduled rate increase is scheduled for July1, 2025. In the event that Dundon increases its standard hourly rates in its ordinary course of business during its retention in these Cases, prior to any increases to the rates set forth in this Application taking effect, Dundon shall provide 10 calendar days' notice to the Committee, the Debtors, and the U.S. Trustee, and shall file a notice of the increase of its standard hourly rates with the Court.

- 11. Dundon will be reimbursed for its reasonable and necessary out-of-pocket expenses (which shall be charged at cost) incurred in connection with this engagement, such as, but not limited to travel, lodging, and business meals.
- 12. Dundon has further advised the Committee that it intends to seek compensation for all time and expenses associated with the preparation of this Application to retain Dundon and related documents, and the preparation of monthly, interim, and final fee applications for Dundon. It will not bill for the defense of any fee applications. Dundon agrees to charge non-working travel time at 50% of the non-working travel time actually incurred.
- 13. Dundon has agreed to accept as compensation such sums as may be allowed by the Court, including on the basis of the professional time spent, the rates charged for such services, the necessity of such services to the administration of the Debtors' estates, the reasonableness of the time within which the services were performed in relation to the results achieved, and the complexity, importance, and nature of the problems, issues or tasks addressed in these Cases.
- 14. Dundon has no agreement with any other entity to share any compensation received, nor will any be made.

DUNDON'S DISINTERESTEDNESS

- 15. The Committee has reviewed the Nahas Declaration, including the "connections" to these Cases disclosed therein, as such term is used in Bankruptcy Rule 2014(a).
- 16. Notwithstanding any such connections, the Committee believes that Dundon is "disinterested," as that term is defined in section 101(14) of the Bankruptcy Code and does not hold or represent an interest adverse to the Debtors' estates with respect to the matters for which Dundon is to be employed, as required by section 328(c) of the Bankruptcy Code.

- 17. Other than as described herein, insofar as Dundon has been able to ascertain, other than in connection with these Cases, neither Dundon nor any professional of Dundon, has any connection (connection being defined as a familial or professional relationship) with the Debtors, their creditors, or any other interested party herein, or their respective attorneys or accountants, or the United States Trustee or any person employed in the Office of the United States Trustee.
- 18. Dundon is conducting a continuing inquiry into matters that would affect its disinterested status. In the event additional disclosure is necessary, Dundon will promptly file a supplemental declaration with this Court setting forth any facts and circumstances relevant thereto.

RELIEF REQUESTED

19. By this Application, the Committee respectfully requests that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, pursuant to Bankruptcy Code sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1, authorizing the Committee to retain and employ Dundon as financial advisor in these Cases. The Committee seeks to retain Dundon effective as of April 14, 2025, the date the Committee selected Dundon as financial advisor.

BASIS FOR RELIEF

20. The Committee selected Dundon because of its extensive experience and knowledge of complex Chapter 11 matters, and believes Dundon is well qualified to represent the Committee in these Cases. For example, and as more fully described in the Nahas Declaration, Dundon has represented official and unofficial committees and other prominent parties in many of the most complex and prominent Chapter 11 bankruptcy cases in recent years, including cases in this jurisdiction.

NOTICE

21. Notice of this Application has been provided to (a) the Debtors; (b) counsel to the Debtors; (c) the U.S. Trustee; and (d) all parties requesting notices pursuant to Bankruptcy Rule 2002. The Committee respectfully submits that no further notice is necessary under the circumstances.

CONCLUSION

WHEREFORE, for the reasons set forth in this Application and in the annexed Nahas Declaration, the Committee respectfully requests that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, authorizing the employment and retention of Dundon as financial advisor to the Committee effective as of April 14, 2025, and granting the Committee such other and further relief as may be just and proper.

Dated: May 27, 2025

The Official Committee of Unsecured Creditors of CTN Holdings, Inc., et al.

By:/s/ Spencer Patton
Spencer Patton, solely in his capacity as
Chairperson of the Committee

Exhibit A (Proposed Order)

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)

ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF DUNDON ADVISERS LLC AS FINANCIAL ADVISOR FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF CTN HOLDINGS, INC., ET AL., NUNC PRO TUNC TO APRIL 14, 2025

Upon consideration of the Application for Order Authorizing the Employment and Retention of Dundon Advisers LLC as Financial Advisor for the Official Committee of Unsecured Creditors of CTN Holdings, Inc., et al., Nunc Pro Tunc to April 14, 2025 (the "Application"), pursuant to sections 328 and 1103 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Local Rule 2014-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), authorizing and approving the employment of Dundon Advisers LLC ("Dundon") as financial advisor to the Official Committee of Unsecured Creditors (the "Committee") appointed in the above-captioned bankruptcy cases (the "Cases") effective as of April 14, 2025; and the declaration of Joshua Nahas in support of the Application annexed thereto (the "Nahas Declaration"); and the Court having jurisdiction to consider the Application and the

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² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that the relief requested in the Application is in the best interests of the Debtors' estates, their creditors and other parties-in-interest; and the Committee having provided adequate and appropriate notice of the Application under the circumstances; and after due deliberation and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

- 1. The Application is GRANTED as set forth herein.
- 2. The Committee is authorized pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code to retain and employ Dundon as financial advisor to the Committee effective as of April 14, 2025.
- 3. Dundon shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with the Cases as set forth in the Application and in compliance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any other applicable procedures or orders of this Court.
- 4. Dundon shall provide at least 10 calendar days' notice to the Committee, the Debtors, and the U.S. Trustee prior to any increases in the rates set forth in the Nahas Declaration and shall file such notice with this Court.
- 5. The Committee and Dundon are authorized and empowered to take all actions necessary to implement the relief granted in this Order.
- 6. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.
- 7. Notwithstanding any provision in the Bankruptcy Rules to the contrary, this Order shall be immediately effective and enforceable upon its entry.
 - 8. Further terms of this Order shall be as follows:

- a. Dundon will only bill 50% of each professional's ordinary and customary hourly rate for non-working travel time and shall not seek the reimbursement of any fees or costs arising from the defense of any of Dundon's fee applications in these Cases;
- b. any and all compensation to be paid to Dundon for services rendered on the Committee's behalf shall be fixed by application to this Court in accordance with sections 330 and 331 of the Bankruptcy Code, such Federal Rules and Local Rules as may then be applicable, and any orders entered in these Cases governing the compensation and reimbursement of professionals for services rendered and charges and disbursements incurred.

Exhibit B (Nahas Declaration)

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)

DECLARATION OF JOSHUA NAHAS IN SUPPORT OF APPLICATION FOR ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF DUNDON ADVISERS LLC AS FINANCIAL ADVISOR FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF CTN HOLDINGS, INC., ET AL., NUNC PRO TUNC TO APRIL 14, 2025

Pursuant to 28 U.S.C § 1746, I, Joshua Nahas, hereby declare:

- 1. I am a managing director of the financial advisory firm Dundon Advisers LLC ("<u>Dundon</u>"), which maintains an office at 10 Bank Street, Suite 1100, White Plains, NY 10606.
- 2. I submit this Declaration (the "<u>Declaration</u>") in support of the application (the "<u>Application</u>")² of the Official Committee of Unsecured Creditors (the "<u>Committee</u>") appointed in the above-captioned cases (the "<u>Cases</u>") for entry of an order, pursuant to sections 328 and 1103(a) of title 11 of the United States Code (the "<u>Bankruptcy Code</u>"), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the "<u>Bankruptcy Rules</u>"), and Local Rule 2014-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "<u>Local Rules</u>"), authorizing and approving the retention and employment of Dundon as financial advisor to the Committee in connection with these Cases effective as of April 14, 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.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

3. Except as otherwise indicated herein, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.

DUNDON'S QUALIFICATIONS AND EXPERIENCE

- 4. Dundon is well qualified and able to represent the Committee in a cost effective and efficient manner. Among the reasons Dundon was selected as financial advisor includes our extensive experience advising committees in the largest and most complex Chapter 11 cases. Dundon's restructuring team is focused, first and foremost, on official committee engagements in large Chapter 11 cases.
- 5. Dundon has successfully advised official committees of creditors and equity security holders and debtors in many prominent and complex bankruptcy cases throughout the country.
- 6. Dundon presently acts or recently acted as financial advisor to: Official Committees of Unsecured Creditors of 1 Global (S.D. Fla.), Agera Energy (S.D.N.Y.), Aequor Management (E.D. Tex.), Aerofarms (D. Del.), AfterShock Comics (C.D. Cal.), Alamo Drafthouse (D. Del.), All American Oil and Gas (W.D. Tex.), Allegiance Coal (D. Del.), Alpha Entertainment (D. Del.), Alpha Media (E.D. Va.), AmeriMark (D. Del.), American Virtual Cloud Technologies (D. Del.), Aralez Pharmaceuticals (S.D.N.Y.), Aztec Shaeffer (W.D. Tex.), BeavEx (D. Del.), Better Nutritionals (C.D. Cal.), Big Village (D. Del.), Celadon (D. Del.), Comcar (D. Del.), Endo Pharmaceuticals (S.D.N.Y.), Franks Theatres (D.N.J.), Front Sight Management (D. Nev.), Fuse Media (D. Del.), García Grain Trading (S.D. Tex.), Glostation USA (C.D. Cal.), Gold's Gym (N.D. Tex.), Goodrich Quality Theaters (W.D. Mich.), Ho Wan Kwok (Connecticut), HyreCar (D. Del.), Impresa Aerospace (D. Del.), In-Shape (D. Del.), iPic (D. Del.), Jagged Peak/Trade Global (D. Nev.), Juno USA (D. Del.), K&W Cafeterias (M.D.N.C.), Lannett (D. Del.), LaSalle Group (N.D. Tex.), LBI Media (D. Del.), Lifesize (S.D. Tex.), Loot Crate (D. Del.), Lucira Health (D. Del.),

Madison Square Boys & Girls Clubs (S.D.N.Y.), Maines Paper & Food (D. Del.), Mallinckrodt (D. Del.), Matheson (ED CA), McClatchy (S.D.N.Y.), Meridian Restaurants (D. Utah), Miles Keller Trucking (C.D. Ill.), Mitchell Gold (D. Delaware), NewAge (D. Del.), NG Purvis Farms (E.D. Va.), Nova Shurline Wildcat (D. Del.), Open Road Films (D. Del.), Pear Therapeutics (D. Del.), Peer Street (D. Del.), Packable (D. Del.), Pipeline Foods (D. Del.), Platinum Corral (E.D.N.C.), Professional Technical Security Services (N.D. Cal.), Proteus Heath (D. Del.), Quanergy (D.N.J.), Remnant Oil Company (W.D. Tex.), Rive Gauche Television (C.D. Cal.), Rocking M Media (D. Kan.), SIW Holdings (D. Del.), Slidebelts (E.D. Cal.), South American Beef (SD IA), Structurlam (D. Del.) Studio Movie Grill (N.D. Tex.), Sunergy (E.D. Cal.), Sungard Availability Services (S.D. Tex.), Tehum Care Services, Inc. (S.D. Tex.), TOMS King (N.D. Ohio), TPC Group (D. Del.), Valmiera Glass (N.D. Ga.), Vector Launch (D. Del.), Video Corporation of America (D.N.J.), Volunteer Energy (S.D. Ohio), Wave Technologies (N.D. Cal.), YogaWorks (N.D. Tex.), and YouFit (D. Del.), and the Ad Hoc Noteholder Group in the Woodbridge Group of Companies (D. Del.), the Ad Hoc Group of Consumer and Worker Litigation Claimants in Hertz (D. Del.), the Committee of Customers in Lear Capital (D. Del.), the Official Committee of Tort Claimants in PG&E (N.D. Cal.), the Ad Hoc Group of Individual Victims in Purdue (S.D.N.Y.), the Ad Hoc Group of Second Lien Bondholders in CalPlant (D. Del.), the Official Committee of Unsecured Commercial Creditors of the Roman Catholic Archdiocese of New Orleans (E.D. La.), the Ad Hoc Group of Equity Security Holders in RAIT (D. Del.), and the Ad Hoc Group of Equity Interest Holders in Voyager (S.D.N.Y.). All of the foregoing are highly complex chapter 11 cases.

DISINTERESTEDNESS OF PROFESSIONALS

- 7. The list of case parties is attached hereto as <u>Schedule 1</u>. A summary of the results of the connections check is attached hereto as <u>Schedule 2</u>.
- 8. Based upon my review of the results of the connections check, to the best of my knowledge after diligent inquiry, neither Dundon, nor any member of Dundon, nor any professionals employed by Dundon, has any "connection," as such term is used in Bankruptcy Rule 2014, with the Debtors herein, their creditors, any other party-in-interest herein, their respective attorneys or accountants, the U.S. Trustee, or any person employed in the office of the U.S. Trustee, except to the extent set forth in **Schedule 2**.
- 9. Dundon also provides direct services to debtors, individual creditors, and potential asset acquirors in many in-court and out-of-court restructuring proceedings; Dundon's individual creditor clients have been appointed to scores of official committees of unsecured creditors in many districts since April 2016, and Dundon has taken an active role in the activities of many of those committees. Dundon regularly advises litigation trustees, liquidating trustees, trust administrators, and plan administrators appointed as part of the resolution of chapter 11 cases, and its senior employees regularly act as liquidating trustees, litigation trustees, trust administrators, plan administrators, members of advisory and supervisory bodies for such trustees and administrators, and independent directors or managers of corporations and companies presently or recently in financial distress. Dundon also provides financial advisory and investment management services in many non-bankruptcy contexts.
- 10. Dundon's sole affiliate is IslandDundon LLC, and Dundon keeps the books and records of IslandDundon LLC. All connections to IslandDundon LLC were reviewed, and would have been revealed by, the same processes that determined connections to Dundon. Dundon carries

out investment activities for its own account and certain institutional clients. Dundon does not presently advise or otherwise participate in its personnel's investment activities for their respective own accounts. Dundon was formerly an SEC-registered Registered Investment Advisor but deregistered from such status when it determined the nature of its investment activities had become such as neither to require nor permit renewal of such registration. Dundon will apply to re-register with the SEC if and when it determines the same to be required, and will consider such application if and when it determines the same to be permitted but not required. IslandDundon LLC does not presently engage in investment activities.

- 11. No investment held by Dundon for its own account or by (to Dundon's knowledge) any of Dundon's clients or personnel relate to the Debtors or would be materially affected by any outcome of the Debtors' bankruptcy.
- 12. No past or current engagement of Dundon would be materially affected by any outcome of the Debtors' bankruptcy.
- 13. If Dundon discovers any information that is contrary to or pertinent to the statements made herein, Dundon will promptly disclose such information to the Court by filing and serving a supplemental declaration.
- 14. For the reasons stated herein, based on the conflicts search conducted to date and described here, to the best of my knowledge Dundon is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code and as used in section 328(c) of the Bankruptcy Code, and does not have an interest materially adverse to the interests of the Debtors' estates or any class of creditors or equity holders of the Debtors.

PROFESSIONAL COMPENSATION

15. Subject to this Court's approval, and in accordance with section 330(a) of the Bankruptcy Code and any orders of the Court, Dundon will charge for its professional services as

financial advisor to the Committee on an hourly basis in accordance with its ordinary and customary hourly rates in effect on the date such services are rendered, and for its actual, reasonable and necessary out-of-pocket disbursements incurred in connection therewith.

16. My current hourly rate is \$850.00. Other professionals will assist with these Cases as needed. As of the date hereof, the hourly rates of Dundon professionals are in the following ranges:

<u>Title</u>	Rate Per Hour
Principal	\$960
Managing Director	\$850
Senior Advisor	\$850
Senior Director	\$755
Director	\$700
Associate Director	\$590
Senior Associate	\$485
Associate	\$350

- 17. The hourly rates set forth above are Dundon's general hourly rates for work of this nature and are consistent with the customary compensation charged by comparably skilled professionals at Dundon in similar matters, including non-bankruptcy matters. In the normal course of its business, Dundon revises its billing rates on an annual basis.³
- 18. Dundon has advised the Committee that it intends to seek compensation for all time and expenses associated with the preparation of this Application to retain Dundon and related documents, and the preparation of monthly, interim or final fee applications for Dundon. It will not bill for the defense of any fee applications. Dundon will bill any non-working travel time at 50% of each professional's ordinary and customary hourly rate.

In the ordinary course, Dundon reviews the billing rates of its professionals annually on or around the first of July each year. The rates described herein reflect the most recent rate increase (as of July 1, 2024). As set forth in the attached order, Dundon will provide ten (10) calendar days' notice to the Committee, the Debtors, and the U.S. Trustee before implementing any periodic increases, and shall file any such notice with the Court.

- 19. In addition, Dundon will apply for reimbursement for any actual and necessary expenses incurred in representing the Committee, including, but not limited to, business meals, lodging, and travel.
- 20. Dundon has not agreed to share (a) any compensation it may receive with another party or person, other than professionals of Dundon or (b) any compensation another person or party has received or may receive in connection with these Cases.
 - 21. Dundon has not received a retainer in connection with these Cases.

AFFIRMATIVE STATEMENT OF DISINTERESTEDNESS

22. Based upon the information available to me, and except as otherwise described herein, Dundon holds no interest adverse to the Debtors, their estates, or any class of creditors or equity holders as to the matters in which it is to be employed. I know of no reason why Dundon cannot act as financial advisor to the Committee.

Case 25-10603-TMH Doc 239-2 Filed 05/27/25 Page 9 of 18

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: May 27, 2025

/s/ Joshua Nahas Joshua Nahas Schedule 1 (Case Parties)

Schedule 1

Potentially Interested Parties List

Debtors

Aspiration Fund Adviser, LLC

Aspiration QFZ, LLC

F/K/A/ Aspiration Sustainability Services, LLC

Catona Climate Solutions, LLC

F/K/A/ Aspiration Sustainability Services, LLC

CTN Holdings, Inc.

F/K/A Aspiration Partners, LLC

CTN SPV Holdings, LLC

F/K/A 413 Digital Assets, LLC

Make Earth Green Again, LLC

Zero Carbon Holdings, LLC

Debtor Executives and/or Board Members

Andrew Durke

Dan Shurey

Danny Duran

Greg Shadwick

Michael Shuckerow

Nate Redmond

Rob Lee

Statton Hammock

Tate Mill

Tracy Bain

Independent Board Members

Jeffrey Varsalone

R. Larence Roth

Debtor Affiliated Companies

Carbon Sequestration I, LLC

Carbon Sequestration II, LLC

Carbon Sequestration III, LLC

Catona Climate Foundation

Restoration Inititives I, LLC

D . . . This Hills

Restoration Inititives II, LLC

Secured Lenders

AGO III, GP LLC, as Collateral Agent

AGO Special Situations II, LP

AGO Special Situations, LP

Inherent Aspiration, LLC

Inherent Group, LP

IPV ASP, LLC

Mark Villanueva

Nano Banc

Oak Tree Capital Management

Zion Consulting and Advisory LLC

Convertible Note Holders

AGO Special Situations Credit, LP

AGO Special Situations II LP

Harmony Holdings, LLC

Long Live Bruce, LLC

Lonsdale Group Limited

Equity Holders

1HMR, LLC

205 Burr Oak Investment LLC

Adam Taub

Adel Davidyan

Adrem X LLC

AGO II GP, LLC

AGO II, LP

AGO III, LP

AGO Special Situations Credit LP

AGO Special Situations II LP

Ahya Kurdi

Albert S Liu

Albert Y. Kim Living Trust

Alejandro Francisco Cano Gutierrez

Alex Pomeroy

Alexandra Horigan

Alexis Maybank

Allan Hammock

Allen & Company, LLC

Alon Nelson

Alpha Edison A, L.P.

Alpha Edison Westwood II A LLC

Alpha Edison Westwood II LLC

Alpha Edison, L.P.

Alvaro Boulet Alonso

Andrei Cherny

Andrew L. Sandler Revocable Trust

Angelica Lomeli

Anna Dukor

AOG Institutional Diversified Fund

APOGEE Pacific LLC Ari Martirosyan

Arie Arik Betesh and Yamit Betesh

Arioan ScoopSA - Aspiration

Arjuna Rajasingham Arlene Waclawek

Arthur and Peta Klitofsky

Aspiration Holdings II SPE, LLC Aspiration Holdings SPE, LLC

Bank of America

Bansbach Capital Group, LLC

Barry Donner Ben Jealous Benjamin Rafii

Benjamin S Heldfond Family Trust

Benjamin Sherman

Bingaman Family Irrevocable Trust

BPCCInc., LLC Brandee Busch Brian Weinstein Brittany Johnson

Budoff Billit Living Trust Carmen Gutierrez Smith

Casa Teresa

Casey Weinstein 2018 Family Trust

Cecilia Martinez del Solar

Cecilia Saez

Charles A. Tharnstrom

Charles W McElfresh

Chicago Carbon Holdings LLC

Christina Margot Ross Christopher Calvert Christopher Coleman

Clayton Bourne

Clear Link Technologies, LLC Clover Private Credit Opportunities

Origination (Levered) II LP

Commerce Investment Group LLC

Craig Randall Johnson

Crawford/Gerber Living Trust dtd 10/7/2009

Crestone Capital Partners LLC
DAM Birdie LLC (Daniel Murillo)

Damavandi 2021 Ins Trust

Damien Varron
Danette Eilenberg

Daniel Duran
Daniel Nir

Daniel Shurey Daniel Zakowski

Danielle Gopen Danielle Wolf

Darwin Capital Advisors II LLC Darwin Capital Advisors LLC

David Flusberg
David Goldsmith
David Jacobs
David Keyes
David Wolpe
DBD Family Trust

DCM Labs

DEA 88 Investments, LP

Deep Field Opportunities Fund, L.P.

Deepak Kumar Deloitte Services, LP Delph Enterprises, Inc. Derris & Company LLC DMC (PED) Limited DNS-Aspire, LLC

Doha Venture Capital LLC

Don Karr

Double Chase Investments LP Double Chase Management LLC Double Chase Management, LLC

Double Diamond Investment Holdings, LP

Dylan Blaty

E3 Asset Management, LLC

Edwin (Tate) Mill Ellen Wilson Elliot Brandt

Emerald Asset Management, Inc. Equityzen Growth Technology Fund, LLC - Series 1145

Eric Johnson Eugene Sperling Evelina Pivavarava

Eyal Bilgrai Eyal Gutentag FABFOUR SCSp

Fabian Andres Vargas Rivera

Fabio Montauti Faisal AlHusseini Forum Entertainment, LLC Jim Meeks Flourish Ventures Fund LLC Joe Carney

John B. Emerson and Kimberly K. Marteau, FootPrint Coalition Ventures Late Stage Fund, LP - A1 Trustees of the Emerson-Marteau

FP Ventures ASP LP Inc.

Trust dated 10/9/2003 Frank A. Cuenca Living Trust Dated May 19, 2005 Johnson Revocable Trust Frank Berrin

Jon Barnwell Frank Yeary Jon Feigelson FWPE Fund 1, LLC Jonathan Alter **GAM Investments LLC**

Joseph A Jolson 1991 Trust George abou Joudi

Joseph Besecker **GL Family Trust** Joseph Chen Glenn Anton Rivers

Joseph Chen Irrevocable Family Trust Global Media Fund LLC Joseph Mulkey

Gluck/Gladden Family Trust Dtd December 15, 2023 Juan David Borrero Goodbank Irrevocable Trust Junius Holding GmbH Gordon Crawford

Justin Kuok **Gregory Shadwick**

Justin Meltzer Investment GSV Capital Corp.

Kaia Gerber Hamid and Nahid Rafii Katherine Lay Hammerman Children Irrevocable Trust

Kathleen Emmett Hannah Vanguilder Kathleen Schier Helen Mullish KC Partners LLC Ian Wentzell Kenneth Choi Ibrahim AlHusseini Kfir Gavrieli IGSB Internal Venture Fund III, LLC

Koh Boon Hwee Ilya Holdings Limited Lauren Rocheleau Inherent Aspiration, LLC Lawrence Berrin Inspira Financial, FBO Lev Moltyaner

Leah Grace Hunt-Hendrix Trust IRA Club FBO Ruben Gallego Roth IRA 2001404

Leslie Morton Irfan Kamal Long Live Bruce, LLC Jabez Dewey Lorraine D. Berrin Jack Oliver Luke Clauson Jaguar Acquisition Limited

Majid El Solh Jaguarundi Partners, LLC

Mali H. Kinberg Revocable Living Trust James Katz Manzanita Ventures LLC James M. Cannon

Marc Stad James R. Gates Separate Porperty Revocable Trust

Marilyn J Goens Rev Liv Trust U/A DTD 11/16/06 Jason Gupta Mark Corentin Cot-Magnas Jedi Capital

Mark J. Silverman Living Trust U/A 7/27/95 JeeAnn Whitney Petrina

Mark Villanueva Jeffrey Denight

Martin Alejandro Bedoya Benavides Jeffrey Harris

Martin Gedalin Jeffrey Susskind Mary Dent Jess Brown Matthew Giles Jessica Berrin Matthew Lee Jessica McMillin

Matthew Russo Philippe von Stauffenberg

Megan Holmes Pilpel Ltd.

Mendonca Family Trust UAD 8/6/07

Metropolitan Levered Partners Fund VII, LP Pohlad Investments, LLC

Metropolitan Partners Fund VI (3C1), LP Polpat LLC

Metropolitan Partners Fund VI, LP

Metropolitan Partners Fund VII, LP

MF Partners, LLC

Michael Christenson

PA Pardue Family Trust

Michael Christenson

Michael O'Mary

Rachel Sheinbein

Michael Shuckerow

Michael Smith

Ravi Sarin

Micharn Pollock

Raycrown AG

Michel Bayoud Reisner Millenium Investments LLC (Jeff Reisner)

Milena Davidson Remember Bruce, LLC
Miller Family Legacy, LLC Renren Lianhe Holdings
Miranda Brouwer Living Trust REYL & CIE S.A.

Mission and Market Fund I, LLC RG Family Investments LLC

Mission Financial Partners

Mohammad Khaja

Rick Hess

Moran Davidyan

MUURAMASA LLC

MX of Kuok Family

Nano Financial Holdings, Inc

Ricki Seidman

RJB Partners LLC

Rob Cherun

Robert Choi

Nascent Line LLC

Nate Redmond

Robert Downey Jr.

Robert J Abernethy

Nathan and Emily Kane Miller Robert Lee

Nathaniel Malka Robert M. Pomeroy NEV Alternatives LLC Roman Micevic

Nikki Murphy Ron and Liraz Harari Living Trust

Nikolaos Nomikos Ron Ben Yosef No. 4 LP Ronald Paz

Oak Tree Capital Management Rosensweig Family Revocable Trust

Oberndorf Enterprises/
Roslyn K Berrin

OEL Venture Investments LLC RPR Gravitas LTD Kfir

OCM Aspiration Holdings, LLC Russell Acar

Oren Abraham Lazar
OS Peteiros Investments, S.L.

Russen Acai

RxR Rocksolid LP

Ryan Graves

Pacific Sequoia Holdings LLC

Palmer Murray Living Trust

Paradox Capital

Paul Eisenstein

Sam Yebri

Samuel Murray

Satya Yenigalla

Selena C. Bryce Trust

Shahak Maiman

Paul Soros 2010 Family Trust A

Peter Early

Shoham Nicolet

Petr Averianov

Silas Holdings III LLC

Philip Remmele

Silversea Chartering SA

SIPI Ventures PTE LTD

SMR Capital Holdings LP

Social Impact Finance II LLC

Social Impact Finance III LLC

Social Impact Finance IV LLC

Social Impact Finance LLC

Spencer Rascoff

Stephan Klee

Stephan Lobmeyr

Stephen Pomeroy

Steve Bush

Steven Glickman

Strategic Business Management

Co (Vivek Singhal)

SuRo Capital Corp.

Susskind Family Trust

SVB Financial Group

SVV GmbH

Synergy Wealth Management Sa

Tara Watumull

Taylor Media Corp

Taylor Vigil

Technology Stock Holding Master Trust /

Series Sinay 2021 Trust

Technology Stock Holding Master Trust /

Series Brown 2021 Trust

Technology Stock Holding Master Trust /

Series Costigan 2021 Trust

Technology Stock Holding Master Trust /

Series Morison 2021 Trust

Technology Stock Holding Master Trust /

Series Ransom 2021

The Dunner Family Trust

The Emerson Marteau Trust

The Glenn A. Rivers

Revocable Trust UA September 28, 2000

The Gordon and Dona Crawford

Trust UTD 8/23/77

The Hugely Successful Company, LLC

The Husseini Group

The Joseph Todd Lonsdale Trust

dated March 4, 2015

The Kit Stone Trust

The Kristin Rivers Revocable Trust

UA September 28, 2000

The Mark Murrel Revocable Trust

Established 1/16/2009

The Mark Murrel Revocable Trust,

Established January 16, 2009

The R L Gopen Trust

The Thomas and Janet Unterman Living Trust

Three Cats Consulting LLC

Timothy Broas

To Ventures LLC

Todd Baker

Todd Koren

Todd Tappin

Tom Unterman

Tracy Bain

TriGen Investments, LP

True North Group LLC

Victoria Velazquez

Vikas Singhal

Voras Navigation SA

Walid Gardezi

Wayne Klitofsky

Weinstein Family Trust

Wesley Jew

West investments IV, LLC

William E. Oberndorf

Yuval Grill

Zack Exley

Zion Consulting and Advisory LLC

Professionals

BDO, CPA Firm

CR3 Partners, LLC, CRO

Hilco Corporate Finance

Jeffrey Varsalone, VRS Restructuring Services

Nate Redmond, AlphaEdison

Paul Edwards, Structured Capital Solutions

Philip Kaminski, Proskaur

(secured creditor corporate counsel)

Robert J. Dehney, Sr., Morris Nichols Arsht & Tunnell

(secured lender BK counsel)

Verita, Claims Agent

Vinny Indelicato, Proskauer

(secured creditor corporate counsel)

Whiteford Taylor & Preston, Debtors' Counsel

Deleware Bankruptcy Judges

Chief Judge John T. Dorsey

Judge Brendan L. Shannon

Judge Craig T. Goldblatt

Judge J. Kate Stickles Judge Karen B. Owens

Judge Laurie Selber Silverstein

Judge Mary F. Walrath Judge Thomas M. Horan

Deleware US Trustee and Bankruptcy Staff

Attix, Lauren Barksdale, Nickita Bates, Malcolm M.

Batts, Cacia Bello, Rachel Brady, Claire Bu, Fang Capp, Laurie Casey, Linda Cavello, Robert Cudia, Joseph Dice, Holly

Dortch, Shakima L. Farrell, Catherine Fox, Jr. Timothy J. Gadson, Danielle Giordano, Diane Girello, Michael Green, Christine Hackman, Benjamin

Haney, Laura Hrycak, Amanda Johnson, Lora Jones, Nyanquoi Konde, Hawa Leamy, Jane Lipshie, Jonathan Lopez, Marquietta

Lugano, Al McCollum, Hannah M. McMahon, Joseph Nyaku, Jonathan O'Malley, James R. Richenderfer, Linda Schepacarter, Richard Serrano, Edith A. Sierra-Fox, Rosa Subda, Paula Thomas, Elizabeth Vara, Andrew R. Walker, Jill Wynn, Dion Yeager, Demitra

Adverse Litigation Parties

Cabin Editing Company, LLC Clear Link Tehnologies, LLC d/b/a The Penny Hoarder

Clover Private Credit Opportunities Organization (Levered) II, LP Compassionate Carbons, LLC Eden Reforestation Projects

Finders.com, LLC

ICR, LLC

Media Force Communications (2007), Ltd.

OurOffice, Inc.

Outfront Media, LLC vs. Aspiration

Financial, LLC and Aspiration Partners, Inc.

Pearl Media Holdings, LLC

Perform [CB], LLC

Slalom, Inc. Socure, Inc.

Vector Media Holdings, LL WNS North America, Inc.

Others former or Affiliated Executives

Andrei Cherny

Ibrahim Ameen AlHusseini

Joseph Sandberg

Other Creditors over \$10k as of 02/28/25

8020 Consulting LLC

Anew Climate, formerly Bluesource

and Elements Markets

APT 304, LLC

Athletes Unlimited

Backupify, Inc.

Baker & Hostetler LLP

Baker McKenzie

Bartko Zankel Bunzel & Miller

Beneficial State Bank

Boston Red Sox Baseball Club Limited Partnership

Cabin Editing Company LLC

Capitol Outdoor, Inc

Carbon Capital Deployment

Chipman Brown Cicero & Cole, LLP

Chloris Geospatial Inc.

Clarity AI CNM LLP

Creative Artists Agency Crown Castle Fiber LLC Davis Wright Tremaine LLP

Dechert LLP

Donnelley Financial Solutions Eden Reforestation Projects

Facebook, Inc. Fact-HR

FactSet Research Systems Inc.

Feedzai Inc Fivetran Inc.

Gibson Dunn & Crutcher LLP

Headlight Labs, Inc

ICONOCLAST Content, Inc

ICR, LLC

IETA (International Emissions

Trading Association)
Impact Tech, Inc

Interprivate III Financial Partners Inc.

IQTalent Partners Inc.

JacksonLewis

Keesal, Young & Logan Kijani Forestry Limited

KL2 Aspire LLC Kroll Associates, Inc LA Clippers LLC

Lamar Texas Limited Partnership

Laurel Strategies, Inc

LinkedIn Locus AG

Management of Native, a Public Benefit Corporation McPherson Strategies LLC Michael Best & Friedrich LLP

Microsoft Corporation Mitchell Sandler LLC

Nathan Camuti

Native, a Public Benefit Corporation

Nixon Peabody LLP

Noble People

Oil Price Information Service, LLC

Path2Response LLC Pendo.io, Inc. Performcb LLC

Pineapple Sustainable Partnerships Ltd

Pivot Media Ventures LLC

Planet Labs PBC

Power Digital Marketing, Inc. PricewaterhouseCoopers LLP

Prodege, LLC

Q2 Software, Inc. (Formerly ClickSWITCH)

Quantiphi, Inc. Rokt Corp S&P Global Inc.

Sandline Discovery LLC Sidley Austin LLP

Sky-High Murals - Colossal Media, LLC

Slack Technologies, LLC

Slalom, LLC Socure. Inc. Stephen Klee Sunshine Sachs SuperMoney LLC Taylor Media Corp

The Free Ride Inc (Circuit)
The Morning Consult, LLC

The National Society of Leadership

and Success, LLC The Young Turks, Inc.

TikTok Inc

Trees for the Future,

a 501(3)(c) Non Profit Organization

Trove Research Limited U.S. Chamber of Commerce

UBS Asset Management (Americas), Inc

Unit21, Inc Uptech

URP XII XIII LLC

US Qatar Business Council Wallsworth WFBM LLP

WNS Global Services UK International Limited

Woodruff Sawyer

Case 25-10603-TMH Doc 239-2 Filed 05/27/25 Page 18 of 18

Schedule 2 (Connections Check) CTN HOLDINGS, INC. Official Committee of Unsecured Creditors Bankruptcy Conflicts Spreadsheet

In the ordinary course of our respective businesses, Dundon Advisers acquires cloud, connectivity, productivity, recruiting and publicity services from Microsoft and its business unit LinkedIn.

In the ordinary course of our respective businesses, Dundon Advisers acquires research services from S&P.

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)

PLEASE TAKE NOTICE that on May 27, 2025, the Official Committee of Unsecured Creditors (the "Committee") appointed in the chapter 11 cases (the "Chapter 11 Cases") of the above-captioned debtors and debtors-in-possession (the "Debtors") filed the Application for an Order Authorizing the Employment and Retention of Dundon Advisers LLC as Financial Advisors for the Official Committee of Unsecured Creditors of CTN Holdings, Inc., et al. Nunc Pro Tunc to April 14, 2025 (the "Application") with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that any objections or responses to the relief requested in the Application must be filed on or before June 10, 2025 at 4:00 p.m. (ET) (the "Objection Deadline") with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801 and served upon, so as to be actually received by, the undersigned proposed counsel for the Committee on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE APPLICATION WILL BE HELD ON A DATE TO BE DETERMINED, IF NECESSARY, BEFORE THE HONORABLE THOMAS M. HORAN, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, WILMINGTON, DELAWARE 19801.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS OR RESPONSES TO THE APPLICATION ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH SUCH MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: May 27, 2025 Wilmington, Delaware /s/ Katharina Earle

Katharina Earle (No. 6348)

GIBBONS P.C.

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.

300 Delaware Avenue, Suite 1015 Wilmington, Delaware 19801-1671 Telephone: (302) 518-6300

E-mail: kearle@gibbonslaw.com

-and-

Robert K. Malone (admitted *pro hac vice*) Brett S. Theisen (admitted *pro hac vice*) Kyle P. McEvilly (admitted *pro hac vice*) **GIBBONS P.C.**

One Gateway Center Newark, New Jersey 07102-5310 Telephone: (973) 596-4500

E-mail: rmalone@gibbonslaw.com btheisen@gibbonslaw.com kmcevilly@gibbonslaw.com

Proposed Counsel for the Official Committee of Unsecured Creditors

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 (CTG)
(Jointly Administered)

CERTIFICATE OF SERVICE

I, Katharina Earle, hereby certify that on May 27, 2025, a true and correct copy of the foregoing Application for Order Authorizing the Employment and Retention of Dundon Advisers LLC as Financial Advisors for the Official Committee of Unsecured Creditors of CTN Holdings, Inc., et al. Nunc Pro Tunc to April 14, 2025 (the "Application") was caused to be served via CM/ECF on all parties who have registered for electronic service in the above-captioned Chapter 11 proceeding.

I further certify that, in addition, I caused the Application to be served on the parties listed below via electronic mail.

Dated: May 27, 2025 Wilmington, Delaware

/s/ Katharina Earle
Katharina Earle (No. 6348)

GIBBONS P.C.

300 Delaware Avenue, Suite 1015 Wilmington, Delaware 19801-1671 Telephone: (302) 518-6300

E-mail: kearle@gibbonslaw.com

-and-

Robert K. Malone (pro hac vice forthcoming) Brett S. Theisen (pro hac vice forthcoming) Kyle P. McEvilly (pro hac vice forthcoming) GIBBONS P.C.

One Gateway Center

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.

Newark, New Jersey 07102-5310 Telephone: (973) 596-4500 E-mail: rmalone@gibbonslaw.com btheisen@gibbonslaw.com kmcevilly@gibbonslaw.com

Proposed Counsel to the Official Committee of Unsecured Creditors

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Brenna A. Dolphin

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Vincent Indelicato

PROSKAUER ROSE LLP

Eleven Times Square New York, NY 10036 Tel: (212) 969-3000

Email: vindelicato@proskauer.com

Counsel for the Lender Group

Office of the United States Trustee Delaware Rosa Sierra-Fox

844 King Street, Suite 2207 Lockbox 35 Wilmington, DE 1980 Email: rosa.sierra-fox@usdoj.gov