

**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)

Related Docket Nos. 65 & 231

**THE DEBTORS' WITNESS AND EXHIBIT LIST FOR SALE HEARING
AND MOTION TO ENFORCE AUTOMATIC STAY HEARING SCHEDULED
FOR MONDAY, JUNE 2, 2025 AT 2:00 P.M.
(PREVAILING EASTERN TIME)**

PLEASE TAKE NOTICE THAT the above-captioned debtors and debtors in possession (the "Debtors"), hereby respectfully submit this witness and exhibit list in connection with the hearing on **June 2, 2025 at 2:00 p.m. (ET)** before the Honorable Thomas M. Horan, United States Bankruptcy Judge in the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801 (the "Hearing") for (i) *Debtors' Motion for Entry of an Order Approving (I)(A) The Debtors' Entry Into Stalking Horse Agreement and Related Expense Reimbursement and Break-Up Fee, (B) The Bidding Procedures in Connection with the Sale of Substantially All of the Debtors' Assets, (C) The Procedures for the Assumption and Assignment of Executory Contracts and Unexpired Leases, (D) The Form and Manner of Notice of the Sale Hearing, Assumption Procedures, and Auction Results, and (E) Dates for an Auction and Sale Hearing; (II)(A) The Sale of Substantially All of the Debtors' Assets Free and Clear of All Claims, Liens, Liabilities, Rights, Interests, and Encumbrances and (B) The*

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), Zero Carbon Holdings, LLC (1679), and Carbon Sequestration III, LLC (2344). The mailing address for the Debtors is 548 Market Street, PMB 72015, San Francisco, CA 94104-5401.



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Debtors' Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (II) Granting Related Relief [Docket No. 65], filed on April 11, 2025; and (ii) *Debtors' Motion for Entry of an Order Enforcing the Automatic Stay Against TREES for the Future* [Docket No. 231], filed on May 23, 2025.

WITNESSES

The Debtors designate the following individuals as witnesses whose live testimony may be relied upon during the Hearing:

1. Miles Staglik, Chief Restructuring Officer of the Debtors;
2. Teri Stratton, Senior Managing Director & National Practice Leader for Restructuring and Special Situations at Hilco Corporate Finance, LLC.

Mr. Staglik's testimony will be in connection with the Debtors' background, finances, the sale of the Debtors' assets, and the Debtors' negotiation of the Asset Purchase Agreement with the Stalking Horse Bidder. Ms. Stratton's testimony will be in connection with the Debtors' marketing and sale process efforts.

EXHIBITS RELATING TO THE DEBTORS' CASE IN CHIEF

The Debtors designate the following exhibits that may be used in connection with the Hearing:

Exhibit	Description	Docket No.
1	Declaration of Miles Staglik in Support of Chapter 11 Petitions and First Day Relief	22
2	Asset Purchase Agreement by and among Inherent Aspiration, LLC, as Purchaser, and CTN Holdings, Inc. and its Subsidiaries Named Herein, as Sellers	65-2
3	Declaration of Miles Staglik in Support of (A) DIP Motion and (B) Bidding Procedures Motion	139

4	Declaration of Teri Stratton in Support of Bidding Procedures Motion	140
5	Order Pursuant to Sections 105, 363, 364, 365 and 541 of the Bankruptcy Code, Bankruptcy Rules 2002, 6004, 6006 and 9007 and Del. Bankr. L.R. 2002-1 and 6004-1 (A) Approving Bidding Procedures for the Sale of Substantially All of the Debtors' Assets; (B) Approving the Debtors' Entry Into Stalking Horse Agreement and Related Expense Reimbursement; (C) Approving Procedures for the Assumption and Assignment of Designated Executory Contracts and Unexpired Leases; (D) Scheduling an Auction and Sale Hearing; (E) Approving Forms and Manner of Notice of Respective Dates, Times, and Places in Connection Therewith; and (F) Granting Related Relief	171
6	Notice of Sale, Bidding Procedures, Auction and Sale Hearing	176
7	Notice of (I) Possible Treatment of Contracts and Leases, (II) Fixing of Cure Amounts, and (III) Deadline to Object Thereto	177
8	Bidding Procedures	178
9	Notice of Filing Proposed Sale Order	211
10	Declaration of Miles Staglik in Support of (I) Motion for Entry of an Order Enforcing the Automatic Stay Against Trees for the Future and (II) Debtors' Motion for Entry of an Order Shortening Notice and Scheduling an Expedited Hearing with Respect to Debtors' Motion for Entry of an Order Enforcing the Automatic Stay Against Trees for the Future	233
11	Notice of Selection of Successful Bidder and Cancellation of Auction	235
12	Order Shortening Notice and Scheduling an Expedited Hearing with Respect to Debtors' Motion	236

	for Entry of an Order Enforcing the Automatic Stay Against Trees for the Future	
13	Declaration of Miles Staglik in Support of the Sale of Substantially All of the Debtors' Assets to Inherent Aspiration, LLC	To Be Filed
14	Declaration of Teri Stratton in Support of the Sale of Substantially All of the Debtors' Assets to Inherent Aspiration, LLC	To Be Filed

EXHIBIT RELATING TO ANY POTENTIAL REBUTTAL CASE

Exhibit	Document	Docket No.
	Any exhibit identified or offered by any other party.	

RESERVATION OF RIGHTS

The Debtors reserve the right to amend, supplement, or modify this Witness and Exhibit List and introduce into evidence: (i) any exhibits listed by other parties, (ii) any documents for the purposes of rebuttal or impeachment, or (iii) any pleading, hearing transcript, order, or other document filed with the Court in this Chapter 11 case or any adversary proceeding. The Debtors further reserve the right (x) to call any witness identified by any other party or for the purposes of rebuttal, and (y) to not call any witness identified herein.

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Dated: May 28, 2025
Wilmington, Delaware

Respectfully submitted,

/s/ Bradley P. Lehman

WHITEFORD, TAYLOR & PRESTON LLC²

William F. Taylor, Jr. (DE No. 2936)

Bradley P. Lehman (DE No. 5921)

600 North King Street, Suite 300

Wilmington, Delaware 19801

Telephone: (302) 353-4144

Facsimile: (302) 661-7950

Email: wtaylor@whitefordlaw.com

blehman@whitefordlaw.com

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

David W. Gaffey (admitted *pro hac vice*)

Brandy M. Rapp (admitted *pro hac vice*)

J. Daniel Vorsteg (admitted *pro hac vice*)

Joshua D. Stiff (admitted *pro hac vice*)

Alexandra G. DeSimone (admitted *pro hac vice*)

3190 Fairview Park Drive, Suite 800

Falls Church, Virginia 22042-4510

Telephone: (703) 280-9260

Email: dgaffey@whitefordlaw.com

brapp@whitefordlaw.com

jdvorsteg@whitefordlaw.com

jstiff@whitefordlaw.com

adesimone@whitefordlaw.com

Counsel to the Debtors and Debtors in Possession

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