

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

CTN HOLDINGS, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10603 (TMH)

(Jointly Administered)

Re.: Docket No. 239

**CERTIFICATION OF COUNSEL**

The undersigned counsel to the Official Committee of Unsecured Creditors in the above captioned cases (the “Committee”) hereby certifies that:

1. On May 27, 2025, the Committee 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* [D.I. 239] (the “Application”). A proposed form of order approving the relief requested in the Application was attached to the Application as Exhibit A (the “Proposed Order”).

2. Pursuant to the *Notice of Application* [D.I. 239-3], the deadline to respond or object to the relief requested in the Application was June 10, 2024 at 4:00 p.m. (ET) (the “Objection Deadline”).

3. As of the Objection Deadline, the Office of the United States Trustee (the “U.S. Trustee”) requested additional information from the Debtors regarding the Application. No other formal or informal responses or objections to the Application were received. The Committee

<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.



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provided the U.S. Trustee with clarifying information which resolved the U.S. Trustee's concerns. No revisions to the Proposed Order were necessary.

**WHEREFORE**, the Committee respectfully requests that the Court enter the Proposed Order without further notice or hearing at the Court's earliest convenience.

Dated: June 11, 2025  
Wilmington, Delaware

/s/ Katharina Earle  
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