

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 No. 175

NOTICE OF AMENDED² AGENDA FOR HEARING
SCHEDULED FOR MAY 19, 2025 AT 2:30 P.M.
(EASTERN TIME)

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

**This proceeding will be conducted in-person. All counsel and witnesses are expected to attend
unless permitted to appear remotely via Zoom.**

I. RESOLVED MATTER:

1. 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 Debtors' Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (II) Granting Related Relief [[Docket No. 65](#); filed April 11, 2025]

Objection Deadline: April 23, 2025 at 4:00 p.m. (ET), extended to May 2, 2025 for the Official Committee of Unsecured Creditors, and extended to May 6, 2025 at 11:00 a.m. (ET) for the United States Trustee.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are CTN Holdings, Inc. (9122); CTN SPV Holdings, LLC (8689); Catona Climate Solutions, LLC (3375); Make Earth Green Again, LLC (4441); Aspiration QFZ, LLC (1532); Zero Carbon Holdings, LLC (1679); Aspiration Fund Adviser, LLC (4214). The Debtors' mailing address is 548 Market Street, PMB 72015, San Francisco, CA 94104-5401.

² Amended items appear in bold.



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Objections Received:

- a. Omnibus Objection of The Official Committee of Unsecured Creditors to the Debtors' (I) DIP Financing Motion and (II) Sale Procedures Motion [[Docket No. 113](#); filed May 2, 2025]
- b. United States Trustee's Objection to Debtors' Motion for Entry of an Order Approving (I)(A) the Debtors' Entry Into Stalking Horse Agreement and Related Expense Reimbursement and Breakup 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 Debtors' Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (III) Granting Related Relief [[Docket No. 117](#); filed May 6, 2025]

Related Documents:

- a. Declaration of Miles Staglik in Support of Chapter 11 Petitions and First Day Relief [[Docket No. 22](#); filed March 31, 2025]
- b. Debtors' Motion for Order Shortening Notice of Hearing on Debtors' Motion to Approve Bidding Procedures for the Sale of Substantially All of the Debtors' Assets [[Docket No. 66](#); filed April 11, 2025]
- c. Order Shortening Notice of Hearing on Debtors' Motion to Approve Bidding Procedures for the Sale of Substantially All of the Debtors' Assets [[Docket No. 70](#); entered April 14, 2025]
- d. Notice of 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 Debtors' Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (III) Granting Related Relief [[Docket No. 71](#); filed April 14, 2025]
- e. Debtors' Omnibus Reply (I) in Support of (A) DIP Motion and (B) Bidding Procedures Motion, and (II) in Response to Objections of (A) Official Committee of Unsecured Creditors and (B) Office of United States Trustee [[Docket No. 127](#); filed May 7, 2025]

- f. The Debtors' Witness and Exhibit List for Final DIP and Bidding Procedures Hearing Scheduled for Monday, May 12, 2025 at 11:00 a.m. (Prevailing Eastern Time) [[Docket No. 129](#); filed May 7, 2025]
- g. Declaration of Miles Staglik in Support of (A) DIP Motion and (B) Bidding Procedures Motion [[Docket No. 139](#); filed May 9, 2025]
- h. Declaration of Teri Stratton in Support of Bidding Procedures Motion [[Docket No. 140](#); filed May 9, 2025]
- i. The Debtors' Amended Witness and Exhibit List for Final DIP and Bidding Procedures Hearing Scheduled for Monday, May 12, 2025 at 11:00 a.m. (Prevailing Eastern Time) [[Docket No. 141](#); filed May 9, 2025]
- j. Notice of Adjournment of Hearing Scheduled for May 12, 2025, at 11:00 a.m. (Eastern Time) [[Docket No. 144](#); filed May 10, 2025]
- k. Supplemental Notice of Adjournment of Hearing Scheduled for May 12, 2025, at 11:00 a.m. (Eastern Time) [[Docket No. 145](#); filed May 10, 2025]
- l. Declaration of Richard Klein in Support of in Support of Bidding Procedures Motion [[Docket No. 147](#); filed May 12, 2025]
- m. The Debtors' Witness and Exhibit List for Final DIP and Bidding Procedures Hearing Scheduled for Wednesday, May 14, 2025 at 11:00 a.m. (Prevailing Eastern Time) [[Docket No. 149](#); filed May 13, 2025]
- n. Certification of Counsel Regarding Debtors' Motion for Entry of an Order Approving (I)(A) The Debtors' Entry Into Stalking Horse Agreement and Related Expense Reimbursement, (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 Debtors' Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (II) Granting Related Relief [[Docket No. 167](#); filed May 14, 2025]
- o. 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 [[Docket No. 171](#); entered May 14, 2025]

Status: The order has been entered.

II. CONTESTED MATTER GOING FORWARD:

2. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Post-Petition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Term Loan Secured Parties, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing and (VI) Granting Related Relief [[Docket No. 21](#); filed March 31, 2025]

Objection Deadline: April 23, 2025 at 4:00 p.m. (ET), extended to May 2, 2025 for the Official Committee of Unsecured Creditors, and extended to May 6, 2025 at 11:00 a.m. (ET) for the United States Trustee.

Objections Received:

- a. Omnibus Objection of The Official Committee of Unsecured Creditors to the Debtors' (I) DIP Financing Motion and (II) Sale Procedures Motion [[Docket No. 113](#); filed May 2, 2025]

Related Documents:

- a. Declaration of Miles Staglik in Support of Chapter 11 Petitions and First Day Relief [[Docket No. 22](#); filed March 31, 2025]
- b. Interim Order (I) Authorizing Debtors to (A) Obtain Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing and (VI) Granting Related Relief [[Docket No. 45](#); entered April 3, 2025]
- c. Notice of Hearing and Entry of Interim Order (I) Authorizing Debtors to (A) Obtain Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing and (VI) Granting Related Relief [[Docket No. 57](#); filed April 7, 2025]
- d. Debtors' Omnibus Reply (I) in Support of (A) DIP Motion and (B) Bidding Procedures Motion, and (II) in Response to Objections of (A) Official Committee of Unsecured Creditors and (B) Office of United States Trustee [[Docket No. 127](#); filed May 7, 2025]

- e. The Debtors' Witness and Exhibit List for Final DIP and Bidding Procedures Hearing Scheduled for Monday, May 12, 2025 at 11:00 a.m. (Prevailing Eastern Time) [[Docket No. 129](#); filed May 7, 2025]
- f. Declaration of Miles Staglik in Support of (A) DIP Motion and (B) Bidding Procedures Motion [[Docket No. 139](#); filed May 9, 2025]
- g. The Amended Debtors' Witness and Exhibit List for Final DIP and Bidding Procedures Hearing Scheduled for Monday, May 12, 2025 at 11:00 a.m. (Prevailing Eastern Time) [[Docket No. 141](#); filed May 9, 2025]
- h. Notice of Adjournment of Hearing Scheduled for May 12, 2025, at 11:00 a.m. (Eastern Time) [[Docket No. 144](#); filed May 10, 2025]
- i. Supplemental Notice of Adjournment of Hearing Scheduled for May 12, 2025, at 11:00 a.m. (Eastern Time) [[Docket No. 145](#); filed May 10, 2025]
- j. The Debtors' Witness and Exhibit List for Final DIP and Bidding Procedures Hearing Scheduled for Wednesday, May 14, 2025 at 11:00 a.m. (Prevailing Eastern Time) [[Docket No. 149](#); filed May 13, 2025]
- k. **Notice of Filing of Amended Approved Budget** [[Docket No. 179](#); filed May 15, 2025]

Status: This matter is going forward.

Dated: May 19, 2025
Wilmington, Delaware

Respectfully submitted,

/s/ Bradley P. Lehman

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³ Whiteford, Taylor & Preston operates as Whiteford, Taylor & Preston LLC in Delaware.

-and-

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