

**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)

Re: Docket No. 240

**CERTIFICATE OF NO OBJECTION REGARDING APPLICATION OF THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN
ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF
GIBBONS P.C. AS ITS COUNSEL NUNC PRO TUNC TO APRIL 13, 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”) hereby certifies that:

1. On May 27, 2025, the Committee filed the *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of Gibbons P.C. as its Counsel Nunc Pro Tunc to April 13, 2025* [D.I. 240] (the “Application”) of Gibbons P.C.

2. Pursuant to the Notice of Application, the deadline to respond or object to the relief requested in the Application was June 10, 2025 at 4:00 p.m. (ET) (the “Objection Deadline”). As of the Objection Deadline, no answer, objection or any other responsive pleading has been received by the Committee or has appeared on the Court’s docket in these Chapter 11 case.

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.



WHEREFORE, the Committee respectfully requests that the Court enter the Proposed Order, attached to the Application as **Exhibit A**, without further notice or hearing at the Court's earliest convenience.

Dated: June 11, 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 (admitted *pro hac vice*)
Brett S. Theisen (admitted *pro hac vice*)
Kyle P. McEvelly (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*