

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: CTN HOLDINGS, INC., <i>et al.</i> , ¹ Debtors.	Chapter 11 Case No. 25-10603 (TMH) (Jointly Administered)
In re: CARBON SEQUESTRATION III, LLC, Debtor.	Chapter 11 Case No. 25-10918 (TMH) (Joint Administration Requested)

**NOTICE OF AMENDED²AGENDA FOR HEARING
SCHEDULED FOR MAY 28, 2025 AT 3:00 P.M.
(EASTERN TIME)**

AT THE DIRECTION OF THE COURT, THE HEARING IS CANCELLED

I. RESOLVED MATTERS:

1. Kijani Forestry, PBC's Motion for an Order Clarifying the Automatic Stay Does Not Apply to Kijani Forestry, PBC's Forward Purchase Agreement Under Section 556 of the Bankruptcy Code [[Docket No. 134](#); filed May 8, 2025]

Objection Deadline: May 22, 2025 at 4:00 p.m. (ET)

Reply Deadline: May 28, 2025 at 10:00 a.m. (ET)

Objections Received: Inherent Group, LP's Limited Objection and Reservation of Rights Regarding Kijani Forestry, PBC's Motion for an Order Clarifying the Automatic Stay Does Not Apply to Kijani Forestry, PBC's Forward Purchase Agreement Under Section 556 of the Bankruptcy Code [[Docket No. 216](#); filed May 22, 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 Amended items appear in bold.



Related Documents:

- a. Kijani Forestry, PBC's Motion to Reschedule Hearing with Respect to Kijani Forestry, PBC's Motion for an Order Clarifying the Automatic Stay Does Not Apply to Kijani Forestry, PBC's Forward Purchase Agreement Under Section 556 of the Bankruptcy Code [[Docket No. 191](#)]; filed May 19, 2025]
- b. Kijani Forestry, PBC's Motion for Entry of an Order Shortening Notice with Respect to Kijani Forestry, PBC's Motion to Reschedule Hearing with Respect to Kijani Forestry, PBC's Motion for an Order Clarifying the Automatic Stay Does Not Apply to Kijani Forestry, PBC's Forward Purchase Agreement Under Section 556 of the Bankruptcy Code [[Docket No. 192](#)]; filed May 19, 2025]
- c. Declaration of Beau Milliken in Support of Kijani Forestry, PBC's Cure Objection, Motion to Reschedule Hearing and Motion to Shorten [[Docket No. 193](#)]; filed May 19, 2025]
- d. Notice of Intent to Serve Subpoena in a Bankruptcy Case on Carbon Capital Deployment I, LLC [[Docket No. 194](#)]; filed May 19, 2025]
- e. Certification of Counsel Regarding Kijani Forestry, PBC's Motion to Reschedule Hearing with Respect to Kijani Forestry, PBC's Motion for an Order Clarifying the Automatic Stay Does Not Apply to Kijani Forestry, PBC's Forward Purchase Agreement Under Section 556 of the Bankruptcy Code [[Docket No. 202](#)]; filed May 20, 2025]
- f. Order Rescheduling the Hearing on Kijani Forestry, PBCs Motion for an Order Clarifying the Automatic Stay Does Not Apply to Kijani Forestry, PBCs Forward Purchase Agreement Under Section 556 of the Bankruptcy Code [[Docket No. 205](#)]; entered May 20, 2025]
- g. Notice of Rescheduled Hearing Regarding Kijani Forestry, PBC's Motion for an Order Clarifying the Automatic Stay Does Not Apply to Kijani Forestry, PBC's Forward Purchase Agreement Under Section 556 of the Bankruptcy Code [[Docket No. 206](#)]; filed May 20, 2025]
- h. Certification of Counsel Regarding Kijani Forestry, PBC's Motion for an Order Clarifying the Automatic Stay Does Not Apply to Kijani Forestry, PBC's Forward Purchase Agreement Under Section 556 of the Bankruptcy Code [[Docket No. 237](#)]; filed May 27, 2025]**
- i. Order Granting Relief from the Automatic Stay to Kijani Forestry, PBC [[Docket No. 238](#)]; entered May 27, 2025]**

Status: **The order has been entered.**

2. Debtors' Supplemental Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases [[Docket Nos. 217](#) and [3](#); filed May 22, 2025]

Objection Deadline: May 27, 2025 at 4:00 p.m. (ET)

Objections Received: None to date.

Related Documents:

- a. Carbon Sequestration III, LLC Petition (Case No. 25-10918) [[Docket No. 1](#); filed May 22, 2025]
- b. Debtors' Motion for Entry of an Order Shortening Notice and Scheduling an Expedited Hearing with Respect to Debtors' Supplemental Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases [[Docket Nos. 218](#) and [4](#); filed May 22, 2025]
- c. Order Shortening Notice and Scheduling an Expedited Hearing with Respect to Debtors' Supplemental Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases [[Docket Nos. 219](#) and [5](#); entered May 23, 2025]
- d. Notice of Hearing of Debtors' Supplemental Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases [[Docket Nos. 220](#) and [6](#); filed May 23, 2025]
- e. **Certificate of No Objection Debtors' Supplemental Motion for Entry of an Order Directing Joint Administration of Chapter 11 Cases [[Docket Nos. 241](#) and [8](#); filed May 27, 2025]**
- f. **Supplemental Order Authorizing Joint Administration of the Debtors' Chapter 11 Cases [[Docket Nos. 243](#) and [9](#); entered May 27, 2025]**

Status: **The order has been entered.**

[Remainder of the page intentionally left blank]

Dated: May 27, 2025
Wilmington, Delaware

Respectfully submitted,

/s/ Bradley P. Lehman

WHITEFORD, TAYLOR & PRESTON LLC³

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

-and-

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

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