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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:

Powin, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-16137 (MBK)

(Jointly Administered)

**DEBTORS' APPLICATION FOR ENTRY OF AN ORDER SHORTENING TIME FOR
HEARING ON JOINT MOTION OF THE PLAN PROPONENTS FOR ENTRY OF AN
ORDER APPROVING (I) THE ADEQUACY OF THE DISCLOSURE STATEMENT ON
CONDITIONAL BASIS, (II) THE SOLICITATION AND NOTICE PROCEDURES, (III)
THE FORMS OF BALLOTS AND NOTICES IN CONNECTION THEREWITH, AND
(IV) CERTAIN DATES WITH RESPECT THERETO**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Powin, LLC ("Powin") and the above-referenced affiliated debtors and debtors in possession (collectively, the "Debtors") in these chapter 11 cases (the "Chapter 11 Cases"), by and through their undersigned counsel, request that the time period to notice a hearing on the *Joint Motion of the Plan Proponents for Entry of an Order Approving (I) the Adequacy of the Disclosure Statement on Conditional Basis, (II) the Solicitation and Notice Procedures, (III) the Forms of Ballots and Notices in Connection Therewith, and (iv) Certain Dates with Respect Thereto* (the "Motion"),² as required by Rule 2002 of the Federal Rules of Bankruptcy Procedures (the

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin Project LLC [1583]; (ii) Powin, LLC [0504]; (iii) PEOS Holdings, LLC [5476]; (iv) Powin China Holdings 1, LLC [1422]; (v) Powin China Holdings 2, LLC [9713]; (vi) Charger Holdings, LLC [5241]; (vii) Powin Energy Ontario Storage, LLC [8348]; (viii) Powin Energy Operating Holdings, LLC [2495]; (ix) Powin Energy Operating, LLC [6487]; (x) Powin Energy Storage 2, Inc., [9926]; (xi) Powin Energy Ontario Storage II LP, [5787]; and (xii) Powin Canada B.C. Ltd. [2239]. Powin, LLC has formally changed its name to BESS RemainCo, LLC. The Debtors intend to file a motion seeking to amend the case caption in these proceedings to reflect such name change.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

“Bankruptcy Rules”) be shortened pursuant to Bankruptcy Rule 9006(c)(1), and respectfully submit:

1. A shortened time hearing is warranted under the circumstances. As detailed in the Motion, nearly four months after the commencement of these Chapter 11 Cases, the Debtors have reached a milestone by proposing a plan that is the product of extensive, good-faith, arm’s length negotiations with their key stakeholders. The Combined Joint Plan and Disclosure Statement, formulated with and supported by the Official Committee of Unsecured Creditors (the “Committee”), provides for an orderly wind-down of the Debtors’ estates, and meaningful recoveries for Holders of Claims. Proceeding on shortened notice to approve the Motion on a ***conditional*** basis will allow the Debtors to promptly commence solicitation and maintain the momentum achieved through months of negotiation and consensus-building. Importantly, adhering to the proposed solicitation and confirmation timeline will materially reduce administrative costs associated with a prolonged stay in chapter 11, thereby preserving value for creditors and advancing the best interests of all parties in interest. The foregoing is particularly critical in these Chapter 11 Cases, as the Debtors have sold substantially all of their assets and have no ongoing operations generating additional value for the estates.

2. Proceeding on shortened notice is also appropriate because the relief requested in the Motion has the support of the Debtors’ key constituents and will not prejudice any party in interest. The Combined Joint Plan and Disclosure Statement was formulated through extensive discussions with the Committee and other major stakeholders, reflected broad consensus on the path forward for these Chapter 11 Cases. Importantly, the Motion seeks only conditional approval of the disclosures in the Combined Joint Plan and Disclosure Statement, and will merely permit the Debtors to commence solicitation in advance of a final combined hearing to consider final

approval of the disclosures and confirmation of the Combined Joint Plan and Disclosure Statement on a final basis. Moreover, the Motion have been filed contemporaneously with the Combined Joint Plan and Disclosure Statement, ensuring that all stakeholders have prompt and complete access to the relevant materials. Under these circumstances, a reduction in the notice of the hearing on the Motion is reasonable and justified to promote efficiency, conserve estate resources, and advance a resolution that enjoys meaningful support.

3. A hearing is requested on before: October 10, 2025 at 1:00 p.m. (prevailing E.T.).
4. Reduction of the time period is not prohibited under Bankruptcy Rule 9006(c)(2).
5. The Debtors request entry of the proposed order shortening time.

Dated: October 6, 2025

/s/ Frank A. Oswald

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EXHIBIT A

(Proposed Form of Order)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

Powin, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-16137 (MBK)

(Jointly Administered)

ORDER SHORTENING TIME PERIOD FOR NOTICE AND SETTING HEARING

The relief set forth on the following pages, numbered one (1) through six (6), is
ORDERED.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin Project LLC [1583]; (ii) Powin, LLC [0504]; (iii) PEOS Holdings, LLC [5476]; (iv) Powin China Holdings 1, LLC [1422]; (v) Powin China Holdings 2, LLC [9713]; (vi) Charger Holdings, LLC [5241]; (vii) Powin Energy Ontario Storage, LLC [8348]; (viii) Powin Energy Operating Holdings, LLC [2495]; (ix) Powin Energy Operating, LLC [6487]; (x) Powin Energy Storage 2, Inc., [9926]; (xi) Powin Energy Ontario Storage II LP, [5787]; and (xii) Powin Canada B.C. Ltd. [2239]. Powin, LLC has formally changed its name to BESS RemainCo, LLC. The Debtors intend to file a motion seeking to amend the case caption in these proceedings to reflect such name change.

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Debtors: Powin, LLC, et al.
Case No. 25-16137 (MBK)
Caption of Order: Order Shortening Time Period for Notice and Setting Hearing

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Debtors: Powin, LLC, et al.

Case No. 25-16137 (MBK)

Caption of Order: Order Shortening Time Period for Notice and Setting Hearing

Upon review of the *Debtors' Application for Entry of an Order Shortening Time for Hearing on Joint Motion of the Plan Proponents for Entry of an Order Approving (I) the Adequacy of the Disclosure Statement on Conditional Basis, (II) the Solicitation and Notice Procedures, (III) the Forms of Ballots and Notices in Connection Therewith, and (iv) Certain Dates with Respect Thereto* (the "Application"), of the above-captioned debtors and debtors-in-possession (collectively, the "Debtors") for entry of an order (this "Order") requesting that the time period for notice of the *Joint Motion of the Plan Proponents for Entry of an Order Approving (I) the Adequacy of the Disclosure Statement on Conditional Basis, (II) the Solicitation and Notice Procedures, (III) the Forms of Ballots and Notices in Connection Therewith, and (iv) Certain Dates with Respect Thereto* (the "Motion"), be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1),

IT IS HEREBY ORDERED THAT:

1. A hearing will be conducted on the Motion on _____, 2025 at _____, before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, Clarkson S. Fisher United States Courthouse, 402 East State Street, Second Floor, Courtroom 8, Trenton, NJ 08608.
2. The Debtors must serve a copy of this Order, and all related documents to all parties in interests by either regular mail or email, as applicable.
3. Service must be made within ____ days of the date of this Order.
4. Notice by telephone is not required.

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Debtors: Powin, LLC, et al.

Case No. 25-16137 (MBK)

Caption of Order: Order Shortening Time Period for Notice and Setting Hearing

5. Any objection to the Motion shall be filed by _____, 2025 at _____ . Any objections to the Motion may be presented orally at the hearing.

6. Information to participate in the hearing via zoom can be found at <https://www.njb.uscourts.gov/powin>.