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December 15, 2025

Via ECF and E-mail to Chambers

Hon. Michael B. Kaplan, Chief U.S.B.J.
Bankruptcy Court, District of New Jersey
Clarkson S. Fisher U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

**Re: Powin, LLC
Case No. 25-16137 (MBK)**

**Issues Regarding Honeywell International Inc. and Assignment of
Warranties – Request for Status Conference at Court Hearing on
December 17, 2025 at 2:00 p.m.**

Dear Judge Kaplan:

This firm, together with Scott Cheatham, Esq. of Adams and Reese, represents Honeywell International Inc. (“Honeywell”) in the above-referenced matter.

We write with regard to finalization of an agreement regarding issues concerning the assignment of warranties and guaranties by the Debtor’s estate.

Honeywell would respectfully ask that the Court schedule a status conference for the court hearing scheduled for this Wednesday, December 17, 2025 in order to bring this issue before the Court and hopefully conclude it. We understood that Your Honor would allow such a request to be made as you discussed resolution of the various issues involving the assignment of warranties.

Essentially, as the parties negotiated the language of the assignment, counsel for the Debtor requested an exclusion of any warranties related to Spark Power and its affiliates, pursuant to various representations and requests made previously in open court.

Following discussions among counsel for the Debtor and counsel for Spark Power, the parties have agreed to exclude warranties regarding Spark Power, but not its affiliates. Therefore, we believe that we have now arrived at language acceptable to all parties.



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However, while those negotiations continued, the Plan became effective and the Debtor now takes the position that the Liquidating Trustee must make this decision.

We have written to counsel for the Debtor and the Liquidating Trustee to try and resolve this matter and also advised them that we would be requesting that Your Honor put this matter on the Court docket as a status conference in order to (i) bring it to the Court's attention; and (ii) resolve it either before or at the hearing.

Respectfully submitted,

RABINOWITZ, LUBETKIN & TULLY, LLC

/s/ Jeffrey A. Cooper

Jeffrey A. Cooper

JAC:rg