IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re NU RIDE INC., *et al.*,[1] Reorganized Debtors.	Chapter 11 Case Nos. 23-10831 (MFW), *et seq.* (Jointly Administered)
COHEN RECYCLING, INC., Plaintiff, vs. NU RIDE INC., Defendant.	Adv. Proc. No. 24-50127 (MFW)

CERTIFICATION OF COUNSEL REGARDING
PROPOSED SCHEDULING ORDER FOR ADVERSARY PROCEEDING

Adam Hiller, counsel for plaintiff Cohen Recycling, Inc. ("Plaintiff"), hereby certifies as follows:

1. On September 5, 2024, Plaintiff filed a Complaint for Declaratory Relief (Docket No. 1), commencing the above-referenced adversary proceeding.

2. At a status conference on October 22, 2024, the Court directed a schedule to govern this case. Attached hereto as **Exhibit A** is a proposed

[1] The Reorganized Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Reorganized Debtors' service address is: Nu Ride Inc. c/o William Gallagher, CEO, M 3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

Scheduling Order for Adversary Proceeding (the "Proposed Scheduling Order"), which reflects my understanding of the Court's directions at the status conference.

3. Counsel for the defendant Nu Ride Inc. ("Defendant") indicated to me that he agrees to the entry of the Proposed Scheduling Order as an order of the Court.

4. Plaintiff requests that the Court enter the Proposed Scheduling Order as an order of the Court at the Court's convenience.

Dated: October 28, 2024
Wilmington, Delaware

Respectfully submitted,

HILLER LAW, LLC

/s/ Adam Hiller

Adam Hiller (DE No. 4105)
300 Delaware Avenue, Suite 210, #227
Wilmington, Delaware 19801
(302) 442-7677 telephone
ahiller@adamhillerlaw.com

Attorney for Plaintiff
Cohen Recycling, Inc.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
NU RIDE INC., *et al.*,[1]	Case No. 23-10831 (MFW)
Reorganized Debtors.	(Jointly Administered)
COHEN RECYCLING, INC., Plaintiff and Counterdefendant,	
vs.	Adv. Proc. No. 24-50127 (MFW)
NU RIDE INC., Defendant and Counterclaimant.	

[PROPOSED] SCHEDULING
ORDER FOR ADVERSARY PROCEEDING

The Court having reviewed this proposed scheduling order (the "Scheduling Order") for the above-referenced adversary proceeding (the "Adversary Proceeding") presented by Nu Ride Inc. ("Nu Ride") and Cohen Recycling Inc. ("CRI" and, together with Nu Ride, the "Parties"), good cause having been shown therefore, and being otherwise fully advised in the premises hereof, does ORDER and ADJUDGE as follows:

1. The Scheduling Order is approved as set forth herein.

[1] The Reorganized Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Reorganized Debtors' service address is: Nu Ride Inc. c/o William Gallagher, CEO, M 3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

EXHIBIT A

2. The schedule of critical events for the adversary proceeding shall be as follows:

I. DISCOVERY

Initial Disclosures. Each Party shall serve its initial disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure ("Rule"), as incorporated in this Adversary Proceeding by Rule 7026 of the Federal Rules of Bankruptcy Procedure, no later than **November 5, 2024**.

Fact Discovery. Fact discovery shall be completed by **January 15, 2025**. Service by e-mail shall constitute valid service upon parties in this case.

II. ORAL DISCOVERY

The parties shall meet and confer to discuss the timing and scheduling of depositions.

III. TRIAL

Following the completion of fact discovery, the Parties shall have a pre-trial conference with the Court on a date and time directed to by the Court after January 15, 2025 to discuss such scheduling matters as shall be necessary or appropriate.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 28, 2024, I caused copies of the foregoing Certification of Counsel to be served via electronic mail upon:

Name	**E-mail**
Eric Monzo	EMonzo@morrisjames.com
Tara C. Pakrouh	TPakrouh@morrisjames.com
Robert J. Stark	RStark@brownrudnick.com
Alexander F. Kasnetz	AKasnetz@brownrudnick.com
James W. Stoll	JStoll@brownrudnick.com

Dated: October 28, 2024
Wilmington, Delaware

/s/ Adam Hiller

Adam Hiller (DE No. 4105)
HILLER LAW, LLC
300 Delaware Avenue, Suite 210, #227
Wilmington, Delaware 19801
(302) 442-7677 telephone

Attorney for Plaintiff