Docket #0031 Date Filed: 1/9/2025

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 ORDER APPROVING STIPULATION REGARDING CASE SCHEDULE

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

1. On October 28, 2024, the Court entered a Scheduling Order For Adversary Proceeding (Docket No. 15) in the above-captioned adversary proceeding (the "Scheduling Order"). Under the Scheduling Order, the fact discovery deadline is January 15, 2025.

[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.

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2. The parties to this adversary proceeding have been engaged in discussions regarding a potential settlement. In order to allow for sufficient time to negotiate regarding a potential settlement, the parties have entered into the Stipulation Regarding Case Schedule attached hereto as **Exhibit A-1** (the "Stipulation") extending the fact discovery deadline by thirty (30) days to February 14, 2025. Attached hereto as **Exhibit A** is a form of proposed order approving the Stipulation (the "Proposed Order").

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

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

Dated: January 9, 2025
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.

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ORDER APPROVING STIPULATION REGARDING CASE SCHEDULE

UPON CONSIDERATION OF the Stipulation Regarding Case Schedule attached hereto as **Exhibit A-1** (the "Stipulation"), the Stipulation is hereby APPROVED. The Court retains jurisdiction to interpret and enforce the terms of this order.

[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

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. NU RIDE INC., Defendant and Counterclaimant.	Adv. Proc. No. 24-50127 (MFW)

STIPULATION REGARDING CASE SCHEDULE

THIS STIPULATION (the "Stipulation") is entered into by and among Nu Ride Inc. and Cohen Recycling Inc. ("CRI") (collectively, the "Parties" and each a "Party").

WHEREAS, on October 28, 2024, this Court entered a *Scheduling Order for Adversary Proceeding* (the "Scheduling Order") [Docket No. 15] setting forth a deadline to complete fact discovery ("Fact Discovery Deadline") of **January 15, 2025**, and that the Parties shall have a pre-trial conference with the Court on a date and time determined by the Court after the Fact Discovery Deadline; and

WHEREAS, the Parties have been engaged in discussions regarding a potential settlement of the claims at issue in this adversary proceeding; and

[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-1

WHEREAS, in order to allow for sufficient time to negotiate regarding a potential settlement, the Parties have agreed to extend the Fact Discovery Deadline **thirty (30) days** to **February 14, 2025**.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties as follows:

1. The Fact Discovery Deadline shall be extended **thirty (30) days** through and including **February 14, 2025**.

2. A pre-trial conference shall take place on a date and time determined by the Court after February 14, 2025, to discuss such scheduling matters as shall be necessary or appropriate.

3. This Stipulation shall be entered as an order of the Court.

Dated: January 9, 2025

MORRIS JAMES LLP

/s/ Eric J. Monzo

Eric J. Monzo (DE Bar No. 5214)
Tara C. Pakrouh (DE Bar No. 6192)
500 Delaware Avenue, Suite 1500
Wilmington, DE 19801
Telephone: (302) 888-6800
Facsimile: (302) 571-1750
E-mail: emonzo@morrisjames.com
tpakrouh@morrisjames.com

-and-

BROWN RUDNICK LLP
Robert J. Stark (admitted *pro hac vice*)
Bennett S. Silverberg (*admitted pro hac vice*)
Alexander F. Kasnetz (admitted *pro hac vice*)
7 Times Square
New York, NY 10036
Telephone: (212) 209-4800
Facsimile: (212) 209-4801
E-mail: rstark@brownrudnick.com
bsilverberg@brownrudnick.com
akasnetz@brownrudnick.com

-and-

Sharon I. Dwoskin (admitted *pro hac vice*)
James W. Stoll (admitted *pro hac vice*)
One Financial Center
Boston, MA 02111
Telephone: (617) 856-8200
Facsimile: (617) 856-8201
E-mail: sdwoskin@brownrudnick.com
jstoll@brownrudnick.com

Counsel to Nu Ride Inc.

Dated: January 9, 2025

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

-and-

Jeff Goldstein, Esquire
Law Office of Jeffrey D. Goldstein, LLC
9211 Corporate Boulevard, Suite 350
Rockville, Maryland 20850
(301) 838-7047 telephone
Jeff@Rockvillelaw.com

Counsel to CRI