Docket #0039 Date Filed: 6/19/2025

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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

DECLARATION OF MATTHEW ALTMAN IN SUPPORT OF NU RIDE INC.'S EMERGENCY MOTION FOR CONTEMPT AND MODIFICATION OF ORDER

I, Matthew Altman, hereby declare the following under penalty of perjury:

1. I am over the age of eighteen (18) and am competent to execute this declaration.

2. I am a Senior Associate at M3 Partners, a financial advisor to Nu Ride Inc.

3. On or around May 21, 2025, I became aware that a Lordstown Endurance ("Endurance") vehicle was listed for sale by Ford Family Auto Collection on the website allcollectorcars.com, which listing remains available as of the date hereof at the following URL: https://www.allcollectorcars.com/for-sale/2023-Lordstown-Endurance-/2736626/. The VIN Number of the Endurance vehicle listed for sale on such website was listed as

[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, M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

2310831250623000000000003

7NYLEWFA4PM001030.

4. Attached as **Exhibit A** are true and correct copies of screenshots of such listing at the foregoing URL.

5. On or around May 21, 2025, I spoke over the phone with a representative of Ford Family Auto Collection whose contact information was listed on the foregoing website. The representative told me that Mr. Rick Ford was the owner of Ford Family Auto Collection; that it was his understanding that Mr. Ford had multiple Endurance vehicles in his possession; and that Mr. Ford would contact me at a later time and / or date.

6. On June 12, 2025, I spoke on the phone with Mr. Ford. Mr. Ford represented that he owned four Endurance vehicles, and that he had operated certain of those vehicles in a limited manner.

7. On June 12, 2025, Mr. Ford provided me with copies of four bills of sale for Endurance vehicles, true and correct copies of which are attached hereto as **Exhibit B**.

8. A true and correct copy of the email from Mr. Ford transmitting such bills of sale is attached hereto as **Exhibit C**.

9. In May 2025, I became aware that an Endurance vehicle was also listed for sale on what I understand to be the Ford Family Auto Collection's website, at the following URL: https://www.fordfamilyautocollection.com/vehicles/158/2023-lordstown-endurance.

10. Attached as **Exhibit D** is a true and correct copy of a screenshot taken of such listing at the foregoing URL.

11. On June 18, 2025, I spoke on the phone with Mr. Ford to confirm additional details. Mr. Ford confirmed that he purchased four vehicles from CRI. Mr. Ford represented that the VINs for the vehicles he purchased ended in -1056, -1030, -1040, and -1042.

12. Mr. Ford represented that all four vehicles in his possession were operational.

13. On June 18, 2025, Mr. Ford provided me with a copy of the bill of sale for the Endurance vehicle bearing VIN 7NYLEWFA4PM001040, a true and correct copy of which is attached hereto as **Exhibit E**.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief.

Dated: June 18, 2025

Matthew Altman

Matthew Altman

Exhibit A

Subscribe to Newsletter | Log In

Your Ride is *Here*.

SEARCH PLACE AN AD FIND A DEALER RESOURCES THE MAN CAVE ACC AUCTIONS

2023 LORDSTOWN ENDURANCE

< BACK TO LISTINGS

Set an Alert | Make Offer | $29,900





FORD FAMILY Auto Collection

Ford Family Auto Collection
180 Artist Ave
Englewood, FL 34223

Dealer Website
All Inventory
Get Directions

Show Phone #

EMAIL SELLER

Name *

Email *

Phone

Message *

Buyer Resources
View All

GET INSURANCE

Better Coverage. Lower Rates.
Heacock CLASSIC
COLLECTOR CAR INSURANCE
www.HeacockClassic.com
800.678.5173

GET FINANCING

Flexible terms up to
240 Months
for qualified borrowers
LEARN MORE

SHIP THIS VEHICLE

Intercity Lines, Inc.
NATIONWIDE ENCLOSED AUTO TRANSPORT
RECEIVE A QUOTE INSTANTLY

FIND PARTS

VEHICLE DESCRIPTION

2023 Lordstown Endurance $29,900

Share this:

VEHICLE DETAILS

Year:	2023
Make:	Lordstown
Model:	Endurance
Mileage:	
Exterior Color:	White
Interior Color:	Black
Trim:	
Body:	
Stock:	001030
Engine Size:	
Transmission:	Automatic
Vin:	7NYLEWFA4PM001030

DEALER INFO

FORD FAMILY Auto Collection

FORD FAMILY AUTO COLLECTION ENGLEWOOD, FL 34223

Show Phone #

All Inventory | Email Seller | Dealer Website | Get Directions

Ford Family Auto Collection was started by a family with 40+ years of experience in the auto industry and a passion for collecting classic and specialty vehicles. We value honesty and transparency in all of our communication, photos, and descriptions.

Exhibit B

MDOT MARYLAND DEPARTMENT OF TRANSPORTATION
MOTOR VEHICLE ADMINISTRATION

VR-181 (03-18)

Bill of Sale

If this form is used to establish the purchase price of your vehicle, a notary is required.

Please describe the vehicle being sold

Year	Make	Model
2023	LORDSTOWN	ENDURANCE

Body Style	Vehicle Identification Number
TRUCK	7NYLEWFA4PM001030

I/We do hereby sell to:

Name of buyer(s) FORD FAMILY AUTO COLLECTION 2931 RIDGE ROAD 101 - 197, ROCKWALL, TX 75032

For the total sum of $ 24,000.00, which has been received. This sum represents the mutually agreed upon purchase price of the vehicle, between both the buyer(s) and the seller(s). The reason the vehicle may be purchased for a price less than the fair market value is as follows.

THIS VEHICLE IS SOLD AS IS. NO WARRANTY. NO TITLE. FOR PARTS ONLY.

To the best of my knowledge, the odometer reading is the actual mileage of the vehicle unless one of the following statements is checked:

odometer reading 931 (no tenths)

☐ 1. The mileage is in excess of its mechanical limits.

☐ 2. The odometer reading is not the actual mileage.

Warning- Odometer Discrepancy

Please notarize your sale. A second space is provided for notarizing an additional party to the transaction who may not be present at the initial notarization. It is not necessary to require two notaries if one will suffice for all parties.

I/we certify under penalty of perjury, that the statements made are true and correct to the best of my/our knowledge, information and belief. I understand that giving a false statement(s) is a misdemeanor and subject to fines not exceeding $500, imprisonment for not more than 2 months, or both.

This 10TH **day of** APRIL **(year)** 2024

Seller(s) signature(s)

Seller(s) printed name(s)

COHEN RECYCLING INC / ANDREW COHEN

Subscribed and sworn to before me:

This _____ **day of** _____ **(year)** _____

Notary Public signature

Notary Public printed name

My Commission Expires _____

Place Seal Here

This 10TH **day of** APRIL **(year)** 2024

Buyer(s) signature(s)

Buyer(s) printed name(s)

Subscribed and sworn to before me:

This _____ **day of** _____ **(year)** _____

Notary Public signature

Notary Public printed name

My Commission Expires _____

Place Seal Here

MARYLAND DEPARTMENT OF TRANSPORTATION
MOTOR VEHICLE ADMINISTRATION

VR-181 (03-18)

Bill of Sale

If this form is used to establish the purchase price of your vehicle, a notary is required.

Please describe the vehicle being sold

Year	Make	Model
2023	LORDSTOWN	ENDURANCE

Body Style	Vehicle Identification Number
TRUCK	7NYLEWFA4PM001030

I/We do hereby sell to:

Name of buyer(s) FORD FAMILY AUTO COLLECTION 2931 RIDGE RD 101 - 197 ROCKWALL, TX 75032

For the total sum of $ 20,000.00, which has been received. This sum represents the mutually agreed upon purchase price of the vehicle, between both the buyer(s) and the seller(s). The reason the vehicle may be purchased for a price less than the fair market value is as follows.

THIS VEHICLE IS SOLD AS IS. NO WARRANTY. NO TITLE. FOR PARTS ONLY.

To the best of my knowledge, the odometer reading is the actual mileage of the vehicle unless one of the following statements is checked:

odometer reading 931 (no tenths)

☐ 1. The mileage is in excess of its mechanical limits.

☐ 2. The odometer reading is not the actual mileage.

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Please notarize your sale. A second space is provided for notarizing an additional party to the transaction who may not be present at the initial notarization. It is not necessary to require two notaries if one will suffice for all parties.

I/we certify under penalty of perjury, that the statements made are true and correct to the best of my/our knowledge, information and belief. I understand that giving a false statement(s) is a misdemeanor and subject to fines not exceeding $500, imprisonment for not more than 2 months, or both.

This 22ND **day of** MAY **(year)** 2024

Seller(s) signature(s)

Seller(s) printed name(s)

COHEN RECYCLING INC / ANDREW COHEN

Subscribed and sworn to before me:

This _____ **day of** _____ **(year)** _____

Notary Public signature

Notary Public printed name

My Commission Expires _____

Place Seal Here

This 22ND **day of** MAY **(year)** 2024

Buyer(s) signature(s)

Buyer(s) printed name(s)

Subscribed and sworn to before me:

This _____ **day of** _____ **(year)** _____

Notary Public signature

Notary Public printed name

My Commission Expires _____

Place Seal Here

MARYLAND DEPARTMENT OF TRANSPORTATION
MOTOR VEHICLE ADMINISTRATION

VR-181 (03-18)

Bill of Sale

If this form is used to establish the purchase price of your vehicle, a notary is required.

Please describe the vehicle being sold

Year	Make	Model
2023	LORDSTOWN	ENDURANCE

Body Style	Vehicle Identification Number
TRUCK	7NYLEWFA7PM001042

I/We do hereby sell to:

Name of buyer(s) FORD FAMILY AUTO COLLECTION 2931 RIDGE RD 101 - 197 ROCKWALL, TX 75032

For the total sum of $ 20,000.00, which has been received. This sum represents the mutually agreed upon purchase price of the vehicle, between both the buyer(s) and the seller(s). The reason the vehicle may be purchased for a price less than the fair market value is as follows.

THIS VEHICLE IS SOLD AS IS. NO WARRANTY. NO TITLE. FOR PARTS ONLY.

To the best of my knowledge, the odometer reading is the actual mileage of the vehicle unless one of the following statements is checked:

odometer reading 1500 (no tenths)

☐ 1. The mileage is in excess of its mechanical limits.

☐ 2. The odometer reading is not the actual mileage.

Warning- Odometer Discrepancy

Please notarize your sale. A second space is provided for notarizing an additional party to the transaction who may not be present at the initial notarization. It is not necessary to require two notaries if one will suffice for all parties.

I/we certify under penalty of perjury, that the statements made are true and correct to the best of my/our knowledge, information and belief. I understand that giving a false statement(s) is a misdemeanor and subject to fines not exceeding $500, imprisonment for not more than 2 months, or both.

This 22ND **day of** MAY **(year)** 2024

Seller(s) signature(s)

Seller(s) printed name(s)

COHEN RECYCLING INC / ANDREW COHEN

Subscribed and sworn to before me:

This _____ **day of** _____ **(year)** _____

Notary Public signature

Notary Public printed name

My Commission Expires _____

Place Seal Here

This 22ND **day of** MAY **(year)** 2024

Buyer(s) signature(s)

Buyer(s) printed name(s)

Subscribed and sworn to before me:

This _____ **day of** _____ **(year)** _____

Notary Public signature

Notary Public printed name

My Commission Expires _____

Place Seal Here

MARYLAND DEPARTMENT OF TRANSPORTATION
MOTOR VEHICLE ADMINISTRATION

VR-181 (03-18)

Bill of Sale

If this form is used to establish the purchase price of your vehicle, a notary is required.

Please describe the vehicle being sold

Year	Make	Model
2023	LORDSTOWN	ENDURANCE

Body Style	Vehicle Identification Number
TRUCK	7NYLEWFA0PM001056

I/We do hereby sell to:

Name of buyer(s) FORD FAMILY AUTO COLLECTION 2931 RIDGE ROAD 101 - 197, ROCKWALL, TX 7503

For the total sum of $ 24,000.00, which has been received. This sum represents the mutually agreed upon purchase price of the vehicle, between both the buyer(s) and the seller(s). The reason the vehicle may be purchased for a price less than the fair market value is as follows.

THIS VEHICLE IS SOLD AS IS. NO WARRANTY. NO TITLE. FOR PARTS ONLY.

To the best of my knowledge, the odometer reading is the actual mileage of the vehicle unless one of the following statements is checked:

odometer reading 433 (no tenths)

☐ 1. The mileage is in excess of its mechanical limits.

☐ 2. The odometer reading is not the actual mileage.

Warning- Odometer Discrepancy

Please notarize your sale. A second space is provided for notarizing an additional party to the transaction who may not be present at the initial notarization. It is not necessary to require two notaries if one will suffice for all parties.

I/we certify under penalty of perjury, that the statements made are true and correct to the best of my/our knowledge, information and belief. I understand that giving a false statement(s) is a misdemeanor and subject to fines not exceeding $500, imprisonment for not more than 2 months, or both.

This 10TH **day of** APRIL **(year)** 2024

Seller(s) signature(s)

Seller(s) printed name(s)

COHEN RECYCLING INC / ANDREW COHEN

Subscribed and sworn to before me:

This _____ **day of** _____ **(year)** _____

Notary Public signature

Notary Public printed name

My Commission Expires _____

Place Seal Here

This 10TH **day of** APRIL **(year)** 2024

Buyer(s) signature(s)

Buyer(s) printed name(s)

Subscribed and sworn to before me:

This _____ **day of** _____ **(year)** _____

Notary Public signature

Notary Public printed name

My Commission Expires _____

Place Seal Here

Exhibit C

From: RICK FORD
To: Matthew Altman
Subject: Fwd: Lordstown trucks
Date: Thursday, June 12, 2025 10:51:17 AM
Attachments: 2023 Lordstown Endurance 1030 & 1042.pdf
2023 Lordstown Endurance.pdf

You don't often get email from rford75578@aol.com. Learn why this is important

Matt,

Attached are the bill of sales for all 4 trucks with the pricing of the units and VIN numbers on all.

Let me know if you need anything else?

Rick Ford
CEO/President
817-805-1353 Cell
Rick@FordFamilyInv.com
Ford Family Investments, LLC

Begin forwarded message:

> **From:** Megen Watkins <Megen@fordfamilyinv.com>
> **Date:** June 12, 2025 at 10:46:21 AM EDT
> **To:** RICK FORD <rford75578@aol.com>
> **Cc:** Jodi Wood <jodi@fordfamilyinv.com>
> **Subject: Re: Lordstown trucks**
>
> Here you go.
>
> Megen
>
> On Thu, Jun 12, 2025 at 9:44 AM RICK FORD <rford75578@aol.com> wrote:
>> Can you please scan and me the bill of sales for all 4 of the Lordstown truck and email to me?
>>
>> Rick Ford
>> CEO/President
>> 817-805-1353 Cell
>> Rick@FordFamilyInv.com
>> Ford Family Investments, LLC

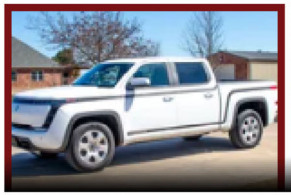
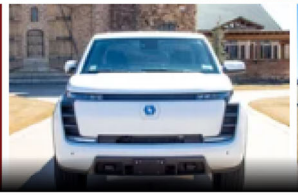
Exhibit D

FORD FAMILY Auto Collection

INVENTORY SELL YOUR VEHICLE ABOUT US CONTACT US

2023 LORDSTOWN ENDURANCE






VIEW MORE PHOTOS

$29,900

$683/MO

2023 LORDSTOWN ENDURANCE

STOCK	001030
VIN	7NYLEWFA4PM001030
ENGINE	ELECTRIC
TRANSMISSION	AUTOMATIC
EXTERIOR	WHITE

CALL FOR DETAILS

REQUEST MORE INFO

HAGERTY Get Quote

Exhibit E

MARYLAND DEPARTMENT OF TRANSPORTATION
MOTOR VEHICLE ADMINISTRATION

VR-181 (03-18)

Bill of Sale

If this form is used to establish the purchase price of your vehicle, a notary is required.

Please describe the vehicle being sold

Year	Make	Model
2023	LORDSTOWN	ENDURANCE

Body Style	Vehicle Identification Number
TRUCK	7NYLEWFA4PM001040

I/We do hereby sell to:

Name of buyer(s) FORD FAMILY AUTO COLLECTION 2931 RIDGE ROAD 101 - 197, ROCKWALL, TX 75032

For the total sum of $ 24,000.00, which has been received. This sum represents the mutually agreed upon purchase price of the vehicle, between both the buyer(s) and the seller(s). The reason the vehicle may be purchased for a price less than the fair market value is as follows.

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This 10TH **day of** APRIL **(year)** 2024

Seller(s) signature(s)

Seller(s) printed name(s)

COHEN RECYCLING INC / ANDREW COHEN

Subscribed and sworn to before me:

This _____ **day of** _____ **(year)** _____

Notary Public signature

Notary Public printed name

My Commission Expires _____

Place Seal Here

This 10TH **day of** APRIL **(year)** 2024

Buyer(s) signature(s)

Buyer(s) printed name(s)

Subscribed and sworn to before me:

This _____ **day of** _____ **(year)** _____

Notary Public signature

Notary Public printed name

My Commission Expires _____

Place Seal Here