Docket #0045 Date Filed: 7/3/2025

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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

NOTICE OF INTENT OF DEFENDANT TO SERVE SUBPOENAS
ON NON-PARTY RICK FORD, FORD FAMILY AUTO COLLECTION

PLEASE TAKE NOTICE pursuant to Rule 45 of the Federal Rules of Civil Procedure, made applicable to this proceeding by Rule 9016 of the Federal Rules of Bankruptcy Procedure, and Federal Rule of Civil Procedure 30(b)(1), made applicable to this proceeding by Federal Rule of Bankruptcy Procedure 7030, and Local Rule 7030-1, Defendant Nu Ride Inc. ("Defendant") intends to serve Subpoenas, in the form attached hereto as **Exhibit A**, on Rick Ford, Ford Family Auto Collection to produce documents no later than July 16, 2025 at 5:00 p.m. (ET) and to testify at a deposition on July 22, 2025 at 10:00 a.m. (ET), or as soon thereafter as service may be effectuated, on:

Richard Ford
6840 Manasota Key Rd
Englewood, FL 34223

[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.

2310831250703000000000001

Ford Family Auto Collection
180 Artists Ave
Englewood, FL 34223

Dated: July 3, 2025
Wilmington, Delaware

MORRIS JAMES LLP

/s/ Tara C. Pakrouh
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
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
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
E-mail: sdwoskin@brownrudnick.com
jstoll@brownrudnick.com

Counsel to Nu Ride Inc.

EXHIBIT A

Subpoenas

UNITED STATES BANKRUPTCY COURT

for the District of Delaware

In re NU RIDE INC., et al.
Debtor

Case No. 23-10831 (MFW)

(Complete if issued in an adversary proceeding)

Chapter 11

COHEN RECYCLING, INC.
Plaintiff
v.
NU RIDE INC.
Defendant

Adv. Proc. No. 24-50127 (MFW)

SUBPOENA TO TESTIFY AT A DEPOSITION IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)

To: Rick Ford
(Name of person to whom the subpoena is directed)

☒ *Testimony*: **YOU ARE COMMANDED** to appear at the time, date, and place set forth below to testify at a deposition to be taken in this bankruptcy case (or adversary proceeding). If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

PLACE	DATE AND TIME
Veritext, 201 E Kennedy Boulevard, Ste 712, Tampa, FL 33602 Remote video conference, or such other time and place as agreed to by the parties	July 22, 2025 at 10:00 a.m. (ET)

The deposition will be recorded by this method:

☐ *Production*: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: July 3, 2025

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

/s/Tara C. Pakrouh
Attorney's signature

The name, address, email address, and telephone number of the attorney representing *(name of party)* Nu Ride Inc. , who issues or requests this subpoena, are:

Tara C. Pakrouh, Esq., Morris James LLP, 500 Delaware Ave., Ste 1500, Wilmington, DE 19801, (302) 888-6800, tpakrouh@morrisjames.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)*: _____
on *(date)* _____ .

☐ I served the subpoena by delivering a copy to the named person as follows: _____
_____
_____ on (*date*) _____ ; or

☐ I returned the subpoena unexecuted because: _____
_____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of $ _____ .

My fees are $ _____ for travel and $_____ for services, for a total of $_____ .

I declare under penalty of perjury that this information is true and correct.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information concerning attempted service, etc.:

Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)
(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)

(c) Place of compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

(A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises, at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

…

(g) Contempt. The court for the district where compliance is required – and also, after a motion is transferred, the issuing court – may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013)

UNITED STATES BANKRUPTCY COURT

for the District of Delaware

In re NU RIDE INC., et al.
Debtor

Case No. 23-10831 (MFW)

(Complete if issued in an adversary proceeding)

Chapter 11

COHEN RECYCLING, INC.
Plaintiff
v.
NU RIDE INC.
Defendant

Adv. Proc. No. 24-50127 (MFW)

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)

To: Rick Ford, Ford Family Auto Collection
(Name of person to whom the subpoena is directed)

☒ *Production*: **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

See Attachment A.

PLACE	DATE AND TIME
Brown Rudnick LLP, One Financial Center, Boston, MA 02111 Production can be made via email to JStoll@brownrudnick.com	July 16, 2025 at 5:00 p.m. (ET)

☐ *Inspection of Premises*: **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

PLACE	DATE AND TIME

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: July 3, 2025

CLERK OF COURT

OR

_____ /s/ Tara C. Pakrouh
Signature of Clerk or Deputy Clerk *Attorney's signature*

The name, address, email address, and telephone number of the attorney representing *(name of party)* Nu Ride Inc. , who issues or requests this subpoena, are:

Tara C. Pakrouh, Esq., Morris James LLP, 500 Delaware Ave., Ste 1500, Wilmington, DE 19801, (302) 888-6800, tpakrouh@morrisjames.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)*: _____
on *(date)* _____ .

☐ I served the subpoena by delivering a copy to the named person as follows: _____
_____
_____ on (*date*) _____ ; or

☐ I returned the subpoena unexecuted because: _____
_____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of $ _____ .

My fees are $ _____ for travel and $_____ for services, for a total of $_____ .

I declare under penalty of perjury that this information is true and correct.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information concerning attempted service, etc.:

Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)
(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)

(c) Place of compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

(A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises, at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

…

(g) Contempt. The court for the district where compliance is required – and also, after a motion is transferred, the issuing court – may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013)

ATTACHMENT A

COHEN RECYCLING, INC. V. NU RIDE INC.
Adv. Proc. No. 24-50127 (MFW)

DEFINITIONS

In construing these Requests, the following definitions shall apply, whether or not capitalized herein:

1. "Adversary Proceeding" means the above-captioned adversary proceeding styled Cohen Recycling Inc. v. Nu Ride Inc., Adv. Pro. No. 24-50127 (MFW)

2. "Affiliate" has the meaning ascribed to such term in section 101(2) of the Bankruptcy Code.

3. "Ahn" refers to Michael Ahn, as well as any Affiliates, agents, assigns, employees, partners, representatives, or any other persons purporting to act on Mr. Ahn's behalf.

4. "Any" means "each and every," "any and all," and "any one."

5. "Bankruptcy Proceedings" means the jointly-administered chapter 11 cases pending before the United States Bankruptcy Court for the District of Delaware under Case No. 23-10831 (MFW).

6. "Cohen" refers to Andrew Cohen, Chief Executive Officer of CRI.

7. "Communication" is used in its broadest sense and includes but is not limited to any transmission or exchange of information between two or more persons, whether orally or in writing, including without limitation any conversation or discussion by means of email, text message, letter, note, memorandum, inter-office correspondence, telephone, telegraph, telex, telecopies, cable communicating data processors, or any other electronic or other medium. The term "Communication" is not limited to internal Communications but includes Communications

between the Debtors and third parties and Communications between or among third parties. For the avoidance of doubt, all Communications fall within the scope of the definition of "Document."

8. "Concerning" means relating to, referring to, describing, evidencing, constituting, consisting of, supporting, prepared in connection with, used in preparation for, or being in any way legally, logically or factually connected with the matter discussed.

9. "CRI" means Cohen Recycling, Inc.

10. "Document" shall have the broadest meaning permitted by Rule 34 of the Federal Rules of Civil Procedure, applicable to this proceeding by Bankruptcy Rule 7034, including but not limited to: any written, graphic, recorded, or illustrative material of any kind or description, however produced or reproduced, and regardless of whether approved, signed, sent, received, or executed, prepared by or for you, in your possession, custody, and/or control. The term "document" includes, but is not limited to, correspondence, memoranda, drafts, computerized records, notes, jottings, books, records, reports, surveys, studies, analyses, films, videotapes, recordings, transcriptions of verbal conversations or statements however made, business forms, labels, papers and forms filed with courts, administrative tribunals and/or other government bodies, notices, messages, calendar and diary entries, appointment books, minutes and other formal or informal memoranda of meetings, and copies of documents that are not identical duplicates of the originals (e.g., because handwritten or "blind" notes and/or other marginalia appear thereon or are attached thereto). The term "document" also includes all electronic and digital documents, including, but not limited to, share-drive documents, electronically stored information, electronic mail messages, text messages, chat messages, social media posts, and messages sent via mobile messaging applications (including, but not limited to, iMessage, WhatsApp, Slack, Signal, Zoom and Teams).

11. "ESI" means information created, manipulated, communicated, stored, or utilized in digital or electronic form. ESI includes, without limitation, data stored on or in computer servers, computer hard drives, computer desktops, laptops, handheld or tablet computers, portable digital media, backup media, CD-ROMs, DVD-ROMs, floppy disks, non-volatile memory including flash memory devices, external hard drives, personal digital assistants (such as Palm, iPhone, or Blackberry devices), cell phones, electronic voicemail systems, text messages, chat messages and instant messages (including, but not limited to, iMessage, WhatsApp, Slack, Signal, Zoom and Teams), e-mails and attachments to e-mails, Internet websites, Internet bulletin boards, internal wikis, GitHub content, social networking posts, social networking applications, SalesForce messages, Redmine messages, or any device or medium capable of storing data in any format.

12. "Including" means including, but not limited to, the referenced items or subject matter.

13. "Person" means any natural person or any entity other than a natural person, including, but not limited to, firms, sole proprietorships, partnerships, corporations, and associations, as well as all divisions, departments, or other units thereof, and means both the singular and plural.

14. "Relating to," "Related to" or "Concerning," or any variant thereof, means, without limitation, referring to, concerning, pertaining to, discussing, mentioning, containing, reflecting, constituting, describing, displaying, showing, identifying, proving, disproving, consisting of, arising out of, supporting or contradicting.

15. "Vehicle" or "Vehicles" refers to any and all Endurance truck vehicles originally manufactured by Lordstown Motors Corp. and its Affiliates.

16. "You," "Your," or any variant thereof, refers to Rick Ford, Ford Family Auto Collection and Ford Automotive, as well as any Affiliates, agents, assigns, directors, employees, officers, parents, partners, representatives, subsidiaries, or any other persons acting or purporting to act on their behalf, and any predecessor or successor of the foregoing.

17. Terms used in the Requests but not otherwise defined shall have the meanings ascribed to them in the Motion or Complaint, as applicable.

INSTRUCTIONS

In construing these Requests, the following instructions shall apply:

1. Unless otherwise specified, the responsive period for each Request is from February 1, 2024, through the present (the "Relevant Period").

2. You must make a diligent search of any and all Documents that are (a) in Your possession, custody, or control, and (b) furnish all Documents and/or information available to You or subject to Your reasonable inquiry.

3. The information requested herein is not restricted to Your personal knowledge, but includes information in the possession of or available to any of Your agents, representatives, and/or professionals. Persons responding to these Requests on Your behalf are directed to make a diligent search of all records within Your possession, custody, or control, including Your paper files and ESI.

4. Each Request shall be construed according to its own terms in accordance with these Definitions and Instructions. Although there may be some overlap, no Request should be understood to limit any other.

5. All terms defined herein shall have the meaning ascribed in the Definitions, regardless of whether such term is capitalized.

6. You shall produce all Documents in the manner in which they are maintained in the ordinary course of Your business. A Request for a Document shall be deemed a Request for any nonidentical copies or drafts of such Documents, as well as all transmittal sheets, cover letters, exhibits, enclosures, appendices, or attachments to the Document, in addition to the Document itself.

7. If any portion of any Document is responsive to any Request(s), the entire Document, including the attachments, disclosures, and/or exhibits must be produced.

8. No attached Documents should be separated from each other.

9. Reference to any corporation or other business organization includes all predecessor and/or successor corporations and/or organizations.

10. To the extent that You deem or consider any Request to be ambiguous, You must set forth the matter deemed ambiguous and the construction You adopted to respond to the Request.

11. The fact that a Document is possessed or produced by another party does not relieve You of Your obligation to produce a copy of the same Document, even if two Documents are identical in all respects.

12. The response to each of these Requests shall first set forth verbatim the Request to which it is responding.

13. Reference to any document, object, tangible thing, or group of persons (*e.g.*, committee counsel or task force) includes all predecessor and successor documents, objects, tangible things or groups of persons which are substantially similar to the specific document, object, tangible thing or group of persons identified in any request for production of documents.

14. If it is not possible to produce any Document called for by the Request, or if You object to any individual Request in whole or in part, state specifically Your objection(s) or the reason(s) for failure to produce the Document.

15. If you object to any Request for Production, in whole or in part, state whether you have possession, custody, or control of any documents otherwise responsive to the Request for Production that you are withholding pursuant to your objection.

16. With respect to any information or facts that you withhold on the claim of attorney-client privilege, the doctrine of work product immunity, or any other statutory or common law privilege, provide a statement, signed by an attorney representing you, setting forth:

a. the source of information or facts;

b. the name of each person with knowledge of such information or facts;

c. a brief description of the nature and subject matter of the information or facts; and

d. the statute, rule, or decision which is claimed to give rise to the privilege or immunity.

17. With respect to any document that you withhold on a claim of attorney-client privilege, the doctrine of work product immunity, or any other statutory or common law privilege, provide a statement, signed by an attorney representing you, setting forth as to each such document:

a. the name(s) of the sender(s) of the document;

b. the name(s) of the author(s) of the document;

c. the name(s) of the person(s) to whom copies were sent;

d. the date of the document;

e. the date on which the document was received by each addressee, copyee, or its recipient;

f. a brief description of the nature and subject matter of the document; and

g. the statute, rule or decision which is claimed to give rise to the privilege or immunity.

All such documents shall be numbered, held separately, and retained intact pending a ruling by the Court on the validity of the claimed privilege.

18. If any information or documents (or portions thereof) otherwise responsive to these Requests was formerly in your possession, custody, or control but has since been lost or destroyed, provide a written statement that identifies: (a) the subject matter and content of the information or document; (b) all persons who ever possessed a copy of the information document; and (c) when and how the information or document was lost or destroyed, and, if destroyed, identify (i) each person having knowledge regarding such loss or destruction; (ii) the person(s) requesting and performing any destruction; (iii) the reason therefore; and (iv) each document evidencing the document's prior existence and/or facts concerning its construction.

19. Instructions for Hard Copy Document Production. Produce documents originating from hard copy sources and attachments ("Hard Copy Documents") in Group IV single-page TIFF format (black and white, 300 dpi) with corresponding searchable OCR text, along with the below-listed metadata fields when available. Provide a standardized load file compatible with Relativity and with a Bates number field included in the load file to match text and metadata with TIFF images. Capture the physical document boundaries (document unitization) in the image and database load files. With respect to Hard Copy Documents, include the following in the data on the load file:

a. Beginning Document Bates Number

b. Ending Document Bates Number

c. Beginning Family Bates Number (begins with 1st page of parent)

d. Ending Family Bates Number

e. Custodian or Source

f. Page Count

g. Date

h. Document Title (if any)

i. Text File Name with extension

j. Text File Path, including filename and extension (must be a separate field from item j)

20. Instructions for Electronically Stored Information. Produce ESI in the following sequenced fashion: conduct a reasonable and good faith search for documents and ESI that are subject to production under the Rules.

a. Black and white images must be 300 DPI Group IV single-page TIFF files. Color images must be produced in JPEG format. Preserve file names and other metadata in database load files. Rename each individual file using a unique item identifier (similar to a bates number but on a file-by-file basis versus a page-by-page basis). Provide only one data load file ("DAT") compatible with Relativity and one image pointer file ("OPT"). The number of TIFF files per folder should not exceed 500 files. Include the metadata, to the extent such metadata is available, identified below:

i. Beginning Document Bates Number;

ii. Ending Document Bates Number;

iii. Beginning Family Bates Number (begins with 1st page of parent);

iv. Ending Family Bates Number;

v. Custodian or Source;

vi. Duplicate Custodians;

vii. Confidentiality Designation;

viii. Page Count;

ix. Redaction (Y/N);

x. Document Date (if available);

xi. Date Modified;

xii. File Name (including extension);

xiii. File Extension;

xiv. Document Type;

xv. Title (non-email);

xvi. Author (non-email);

xvii. From;

xviii. To;

xix. CC;

xx. BCC;

xxi. Subject;

xxii. Email Date Received (Local Time Zone);

xxiii. Email Time Received (Local Time Zone);

xxiv. Email Date Sent (Local Time Zone);

xxv. Email Time Sent (Local Time Zone);

xxvi. Time Zone;

xxvii. Chat Type;

xxviii. Text File Name with extension;

xxix. Text File Path, including filename and extension;

xxx. Native File Path, including file name and extension;

xxxi. Timestamp (photos only);

xxxii. Geolocation information (photos only);

xxxiii. File Size;

xxxiv. MD5 Hash Values (or alternatively agreed upon Hash Standard);

xxxv. Message ID;

xxxvi. Conversation Thread ID; and

xxxvii. Production Volume.

b. Perform de-duplication of ESI within and across custodians (globally) according to MD5 or SHA-1 hash values, and produce only a single copy of identical ESI. Entire document families may constitute duplicate ESI. Do not break up document families through de-duplication.

c. Preserve parent-child relationships (the association between an attachment and its parent document) where possible and provide a Beginning Family Bates Number and Ending Family Bates Number for each produced attachment in the data load file.

d. If you are producing iMessages, Short Message Service files or instant messenger services such as but not limited to: Slack, Signal, Discord, Microsoft Teams, Telegram, Text messages (MMS, SMS, iMessage, Whatsapp), Google Chat, Bloomberg Chat, Instagram, they should be produced with the entire conversation and the family group as one file or produced no smaller than by day (24-hour period) ensuring that the entire conversation thread is maintained in a family group.

e. Some document types will not be imaged for production unless redactions are applied, *i.e.* spreadsheets those documents should be produced in native format with a slip-sheet included with the image collection indicating, "Document Produced in Native Format", titled after the Beginning Document Bates Number of the native files, there should be no gaps in the image collection.

f. Each page of every document should be endorsed with the bates number on the lower right corner of each page of the document.

g. If documents require an additional endorsement, the additional endorsement should be placed in the lower right corner of each page of the document.

h. The export will include the following load files: DAT and OPT files

i. The data file (.DAT) contains all of the fielded information that will be loaded into the review database. The first line of the .DAT file must be a header record identifying the field

names. The .DAT file must use the following Concordance® default delimiters:

1. Comma ASCII character 20;

2. Quote þ ASCII character 254;

3. Newline ® ASCII character 174;

ii. Date fields should be provided in the Date/Time format, i.e. 05/28/2016 7:11 AM. Dates must be in a valid format. For example, 01/00/2000 or 00/00/0000 are **not** valid dates; and

iii. The image cross-reference file is needed to link the images to the database. It is a comma-delimited file consisting of seven fields per line. There must be a line in the cross-reference file for every image in the database.

i. Text must be produced as separate document-level text files, **not** as fields within the .DAT file. Text files may be in either ANSI or Unicode format, however, ALL text files must be in the same format within the same production. The Text Path field must be included to provide the file path and name of the extracted text file on the produced storage media. The text file must be named after the Beginning Document Bates Number. PLEASE DO NOT include the text in the .DAT file.

21. These Requests are continuing in nature and when new knowledge or information comes to Your attention, shall be supplemented forthwith.

22. You are required to preserve and maintain any Documents that are related to the subject matter of the Requests, regardless of whether You deem them responsive to the Requests. You shall instruct Your employees, contractors, professionals, and agents to do the same and shall take steps to ensure that they fulfill these obligations.

REQUESTS FOR PRODUCTION

1. All Documents and Communications relating to, reflecting, or concerning CRI's and/or Cohen's sale of any Vehicles to You or any of Your Affiliates or related business entities.

2. All Documents and Communications relating to, reflecting, or concerning Ahn's sale of any Vehicles, individually or on behalf of CRI, to You or any of Your Affiliates or related business entities.

3. All Communications relating to, reflecting or concerning the Vehicles between CRI and You or any of Your Affiliates or related business entities.

4. All Communications relating to, reflecting or concerning the Vehicles between Michael Ahn and You or any of Your Affiliates or related business entities.

5. All Documents and Communications relating to, reflecting or concerning payment for any Vehicle, including, but not limited to, checks, wire transfers, cash receipts, bank records, and bills of sale.

6. All Documents and Communications relating to, reflecting or concerning the delivery, pick-up, or exchange of Vehicles between You and CRI.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of July, 2025, I caused to be served a true and correct copy of the *Notice of Intent of Defendant to Serve Subpoenas on Non-Party Rick Ford, Ford Family Auto Collection* upon the parties that are registered to receive notice via the Court's CM/ECF notification system, and additional service via electronic mail on the parties listed on the attached service list.

/s/ Tara C. Pakrouh
Tara C. Pakrouh (DE Bar No. 6192)

[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.

Service List

Adam Hiller, Esq.
HILLER LAW, LLC
300 Delaware Avenue, Suite 210, #227
Wilmington, Delaware 19801
ahiller@adamhillerlaw.com

-and-

Jeff Goldstein, Esq.
Law Office of Jeffrey D. Goldstein, LLC
9211 Corporate Boulevard, Suite 350
Rockville, Maryland 20850
Jeff@Rockvillelaw.com

Attorney for Plaintiff, Cohen Recycling, Inc.