Docket #0056 Date Filed: 8/19/2025

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)
	Re: D.I. 1541
COHEN RECYCLING, INC.,	
Plaintiff,	
v.	Adv. Proc. No. 24-50127 (MFW)
NU RIDE INC.,	**Re: Adv. D.I. 53**
Defendant.	

CERTIFICATE OF NO OBJECTION REGARDING MOTION OF NU RIDE INC. FOR APPROVAL OF AMENDED AND RESTATED STIPULATION AND SETTLEMENT AGREEMENT BETWEEN COHEN RECYCLING, INC., AND NU RIDE INC., PURSUANT TO BANKRUPTCY RULE 9019

The undersigned counsel, hereby certify as follows:

On June 19, 2025, Nu Ride Inc. and its affiliated reorganized debtors in the above-captioned proceeding (the "Nu Ride"), by and through their undersigned counsel, filed *Motion of Nu Ride Inc. for Approval of Amended and Restated Stipulation and Settlement Agreement Between Cohen Recycling, Inc., and Nu Ride Inc., Pursuant to Bankruptcy Rule 9019* (the "Motion") [D.I. 1541; Adv. D.I. 53] (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court").

[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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The deadline to object to the Motion was August 18, 2025, at 4:00 p.m. (ET).

The undersigned further certifies that after reviewing the Court's docket in this case and adversary proceeding, no formal answer, objection, or other responsive pleading to the Motion appears thereon. Nu Ride respectfully request that the Court enter the Order attached to the Motion, and attached hereto as **Exhibit A**.

Dated: August 19, 2025
Wilmington, Delaware

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Defendant, Nu Ride Inc.

EXHIBIT A

Proposed Order

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)
	Re: D.I. 1541
COHEN RECYCLING, INC.,	
Plaintiff,	
v.	Adv. Proc. No. 24-50127 (MFW)
NU RIDE INC.,	**Re: Adv. D.I. 53**
Defendant.	

ORDER GRANTING MOTION OF NU RIDE INC. FOR APPROVAL OF AMENDED AND RESTATED STIPULATION AND SETTLEMENT AGREEMENT BETWEEN COHEN RECYCLING, INC., AND NU RIDE INC., PURSUANT TO BANKRUPTCY RULE 9019

Upon consideration of the *Motion of Nu Ride Inc. for Approval of Amended and Restated Stipulation and Settlement Agreement Between Cohen Recycling, Inc., and Nu Ride Inc., Pursuant to Bankruptcy Rule 9019* (the "Motion")[2] and the Court finding that (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, (ii) venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409, and (iii) this is a core proceeding pursuant to 28 U.S.C. § 157(b); and the Court having determined that adequate notice of the Motion was given; and that sufficient

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[2] Capitalized terms otherwise noted defined herein shall have the same meanings ascribed to them in the Motion.

legal and factual bases exist for the relief requested in the Motion; and after due deliberation, the Court having determined that the relief requested in the Motion is in the best interest of the Debtors' estates and their creditors; and good and sufficient cause having been shown; it is hereby **ORDERED** that:

1. The Motion is GRANTED, as set forth herein.

2. The Amended and Restated Settlement Agreement attached as **Exhibit B** to the Motion is approved in its entirety pursuant to sections 105(a) and 363(b) of the Bankruptcy Code and Bankruptcy Rule 9019.

3. The Movants are hereby authorized to take such additional actions or execute such additional documents as are necessary or appropriate to implement the terms of the Amended and Restated Settlement Agreement.

4. Notwithstanding the possibility of Rules 6004, 7062, or 9014 of the Bankruptcy Rules, any other Bankruptcy Rule, this Order shall be immediately effective and enforceable upon its entry and there shall be no stay of effectiveness or execution of this Order.

5. The Court shall retain jurisdiction with respect to all matters arising from or related to the interpretation, implementation, or enforcement of the Amended and Restated Settlement Agreement or this Order.