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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:	Chapter 11
Powin, LLC, *et al.*,[1]	Case No. 25-16137 (MBK)
Debtors.	(Jointly Administered)

[1] The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin Project LLC [1583]; (ii) Powin, LLC [0504]; (iii) PEOS Holdings, LLC [5476]; (iv) Powin China Holdings 1, LLC [1422]; (v) Powin China Holdings 2, LLC [9713]; (vi) Charger Holdings, LLC [5241]; (vii) Powin Energy Ontario Storage, LLC [8348]; (viii) Powin Energy Operating Holdings, LLC [2495]; (ix) Powin Energy Operating, LLC [6487]; (x) Powin Energy Storage 2, Inc., [9926]; (xi) Powin Energy Ontario Storage II LP, [5787]; and (xii) Powin Canada B.C. Ltd. [2239]. Powin, LLC has formally changed its name to BESS RemainCo, LLC. The Debtors intend to file a motion seeking to amend the case caption in these proceedings to reflect such name change.

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DEBTORS' APPLICATION FOR ENTRY OF AN ORDER SHORTENING TIME FOR HEARING ON JOINT MOTION PURSUANT TO 11 U.S.C. § AND FED. R. BANKR. P. 7023 AND 9019 TO (I) APPROVE THE SETTLEMENT PURSUANT TO FED. R. BANKR. P. 9019, (II) PRELIMINARILY APPROVE THE SETTLEMENT PURSUANT TO FED. R. BANKR. P. 7023, (III) APPROVE THE FORM AND MANNER OF NOTICE TO THE SETTLEMENT CLASS MEMBERS OF THE SETTLEMENT, (IV) SCHEDULE A FAIRNESS HEARING TO CONSIDER FINAL APPROVAL OF THE SETTLEMENT, (V) FINALLY APPROVE THE SETTLEMENT PURSUANT TO FED. R. BANKR. P. 7023 AFTER THE FAIRNESS HEARING, AND (VI) GRANT RELATED RELIEF

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

The above-referenced affiliated debtors and debtors in possession (collectively, the "Debtors") in these chapter 11 cases (the "Chapter 11 Cases"), by and through their undersigned counsel, request that the time period to notice a hearing on the *Joint Motion Pursuant to 11 U.S.C. § and Fed. R. Bankr. P. 7023 and 9019 to (I) Approve the Settlement Pursuant to Fed. R. Bankr. P. 9019, (II) Preliminarily Approve the Settlement Pursuant to Fed. R. Bankr. P. 7023, (III) Approve the Form and Manner of Notice to the Settlement Class Members of the Settlement, (IV) Schedule a Fairness Hearing to Consider Final Approval of the Settlement, (V) Finally Approve the Settlement Pursuant to Fed. R. Bankr. P. 7023 After the Fairness Hearing, and (VI) Grant Related Relief* (the "WARN Settlement Motion"),[2] as required by Rule 2002 of the Federal Rules of Bankruptcy Procedures (the "Bankruptcy Rules") be shortened pursuant to Bankruptcy Rule 9006(c)(1), and respectfully submit:

1. A shortened-time hearing is warranted. As set forth in the WARN Settlement Motion, the WARN Claims are significant priority claims of the Debtors' estates, and approval of the Settlement Agreement is a critical predicate to confirmation of the Debtors' Plan scheduled for

[2] Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

November 25, 2025. Further, given the central role of the Settlement in clearing the way for confirmation, expedited consideration is both necessary and appropriate.

2. Shortened notice will also not prejudice any party and is supported by the Debtors' key stakeholders. The WARN Settlement Motion and Settlement Agreement are the result of extensive, arms-length negotiations with the Debtors, Committee and counsel to and proposed class representatives for the WARN Claims, underscoring the broad consensus on this compromise and its significance to these Chapter 11 Cases. Moreover, the principal terms of the Settlement were already disclosed to creditors in the Plan Supplement filed on November 7, 2025 (Docket No. 1036, Ex. I), and the executed Settlement Agreement does not materially deviate from those previously noticed terms. Under these circumstances, reducing the notice period promotes efficiency, conserves estate resources, and facilitates a value-maximizing resolution without imposing any unfair prejudice on any party in interest..

3. A hearing is requested on before: November 25, 2025 at 11:30 a.m. (prevailing E.T.).

4. Reduction of the time period is not prohibited under Bankruptcy Rule 9006(c)(2).

5. The Debtors request entry of the proposed order shortening time.

Dated: November 23, 2025 */s/ Tania M. Moyron*

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EXHIBIT A

(Proposed Form of Order)

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

In re:	Chapter 11
Powin, LLC, *et al*.,[1]	Case No. 25-16137 (MBK)
Debtors.	(Jointly Administered)

ORDER SHORTENING TIME PERIOD FOR NOTICE AND SETTING HEARING

The relief set forth on the following pages, numbered one (1) through four (4), is **ORDERED.**

[1] The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin Project LLC [1583]; (ii) Powin, LLC [0504]; (iii) PEOS Holdings, LLC [5476]; (iv) Powin China Holdings 1, LLC [1422]; (v) Powin China Holdings 2, LLC [9713]; (vi) Charger Holdings, LLC [5241]; (vii) Powin Energy Ontario Storage, LLC [8348]; (viii) Powin Energy Operating Holdings, LLC [2495]; (ix) Powin Energy Operating, LLC [6487]; (x) Powin Energy Storage 2, Inc., [9926]; (xi) Powin Energy Ontario Storage II LP, [5787]; and (xii) Powin Canada B.C. Ltd. [2239]. Powin, LLC has formally changed its name to BESS RemainCo, LLC. The Debtors intend to file a motion seeking to amend the case caption in these proceedings to reflect such name change.

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Counsel for Debtors and Debtors in Possession

Upon review of the *Debtors' Application for Entry of an Order Shortening Time for Hearing on Joint Motion Pursuant to 11 U.S.C. § and Fed. R. Bankr. P. 7023 and 9019 to (I) Approve the Settlement Pursuant to Fed. R. Bankr. P. 9019, (II) Preliminarily Approve the Settlement Pursuant to Fed. R. Bankr. P. 7023, (III) Approve the Form and Manner of Notice to the Settlement Class Members of the Settlement, (IV) Schedule a Fairness Hearing to Consider Final Approval of the Settlement, (V) Finally Approve the Settlement Pursuant to Fed. R. Bankr. P. 7023 After the Fairness Hearing, and (VI) Grant Related Relief* (the "Application"), of the above-captioned debtors and debtors-in-possession (collectively, the "Debtors") for entry of an order (this "Order") requesting that the time period for notice of the *Joint Motion Pursuant to 11*

U.S.C. § and Fed. R. Bankr. P. 7023 and 9019 to (I) Approve the Settlement Pursuant to Fed. R. Bankr. P. 9019, (II) Preliminarily Approve the Settlement Pursuant to Fed. R. Bankr. P. 7023, (III) Approve the Form and Manner of Notice to the Settlement Class Members of the Settlement, (IV) Schedule a Fairness Hearing to Consider Final Approval of the Settlement, (V) Finally Approve the Settlement Pursuant to Fed. R. Bankr. P. 7023 After the Fairness Hearing, and (VI) Grant Related Relief (the "WARN Settlement Motion"), be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1),

IT IS HEREBY ORDERED THAT:

1. A hearing will be conducted on the WARN Settlement Motion on November 25, 2025 at _____, before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, Clarkson S. Fisher United States Courthouse, 402 East State Street, Second Floor, Courtroom 8, Trenton, NJ 08608.

2. The Debtors must serve a copy of this Order, and all related documents to all parties in interests by either regular mail or email, as applicable.

3. Service must be made within ____ days of the date of this Order.

4. Notice by telephone is not required.

5. Any objection to the WARN Settlement Motion shall be filed by _____, 2025 at _____. Any objections to the WARN Settlement Motion may be presented orally at the hearing.

6. Information to participate in the hearing via zoom can be found at https://www.njb.uscourts.gov/powin.