Docket #1437 Date Filed: 08/14/2026

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

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

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

APPLICATION FOR ORDER SHORTENING TIME

RH Shipping (USA), L.L.C. ("RH USA") and R.H. Shipping & Chartering, S. de R.L. de C.V. ("RH Mexico" and together with RH USA, "RH Shipping"), by and through their undersigned counsel, requests by this *Application for Order Shortening Time* (the "Application") that the time to respond to *RH Shipping's Motion to Compel Payment of Agreed-Upon Storage*

[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]. The Debtors' mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.

and Associated Costs (the "Motion") be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), for the reasons set forth below:

1. A shortened time for notice and hearing is requested because the Motion seeks to compel J.S. Held LLC, as the Liquidating Trustee of the Powin Liquidating Trust (the "Trustee" of the "Trust") to comply with its obligations set forth by an order of this Court. As set forth in the Motion, the Trust is required to make $ 701,280.00 in payments to RH Shipping (the "Amount Due") for storage and related expenses that RH Shipping has incurred (the "Storage Costs") by storing goods in which the Trust holds an interest (the "RH Inventory"). Despite a deadline of August 13, 2026 to pay the Amount Due, the Trust has made no payments to RH Shipping at all, leaving RH Shipping no choice but to file the Motion and this Application to respectfully request that the Motion be heard on an expedited basis.

2. RH Shipping requests that the Motion be heard at the Court's earliest available date. RH Shipping submits that the Motion be heard on an expedited basis to avoid the additional delay and Storage Costs that would be associated with having the Motion heard on regular notice at the following omnibus hearing.

3. RH Shipping submits that no party in interest is prejudiced by this Application or the relief requested herein. It is essential that RH Shipping be permitted to proceed on an expedited basis to avoid the cost and delay of not having the Motion heard until a following omnibus hearing.

4. This shortening of time is not prohibited by Bankruptcy Rule 9006(c)(1).

WHEREFORE, RH Shipping respectfully requests entry of the proposed order shortening time, in substantially the form submitted herewith as **Exhibit A**, granting the relief requested herein, and such other relief as is just and proper under the circumstances.

Dated: August 14, 2026
Wilmington, Delaware

Respectfully submitted,
BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP

/s/ *Kevin M. Capuzzi*

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EXHIBIT A

Proposed Form of Order

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

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In re:

Powin, LLC, *et al.*,[1]

Debtors.

Chapter 11

Case No. 25-16137 (MBK)

Judge: Michael B. Kaplan

(Jointly Administered)

ORDER SHORTENING TIME PERIOD FOR NOTICE, SETTING HEARING AND LIMITING NOTICE

The relief set forth on the following pages, numbered two (2) and three (3), is hereby 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]. The Debtors' mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.

After review of the application of RH Shipping (USA), L.L.C. ("RH USA") and R.H. Shipping & Chartering, S. de R.L. de C.V. ("RH Mexico" and together with RH USA, "RH Shipping"), for the reduction of time for a hearing on *RH Shipping's Motion to Compel Payment of Agreed-Upon Storage and Associated Costs* under Fed. R. Bankr. P. 9006(c)(1), it is

ORDERED as follows:

1. A hearing will be conducted on the matter on _____ at _____ before the Honorable Michael B. Kaplan, United States Bankruptcy Judge in the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Second Floor, Courtroom 8, Trenton, NJ 08608.

2. The Applicant must serve a copy of this Order, and all related documents, on the following parties:

_____

_____

by ☐ each, ☐ any of the following methods selected by the Court:

☐ fax, ☐ overnight mail, ☐ regular mail, ☐ email, ☐ hand delivery

3. The Applicant must also serve a copy of this Order, and all related documents, on the following parties:

_____

_____

by ☐ each, ☐ any of the following methods selected by the Court:

☐ fax, ☐ overnight mail, ☐ regular mail, ☐ email, ☐ hand delivery

4. Service must be made:

☐ on the same day as the date of this order, or

☐ within _____ day(s) of the date of this Order.

5. Notice by telephone:

☐ is not required

☐ must be provided to _____

☐ on the same day as the date of this Order, or

☐ within _____ day(s) of the date of this Order.

6. A *Certification of Service* must be filed prior to the hearing date.

7. Any objections to the motion/application identified above:

☐ must be filed with the Court and served on all parties in interest by electronic or overnight mail _____ day(s) prior to the scheduled hearing; or

☐ may be presented orally at the hearing.

8. ☐ Court appearances are required to prosecute the motion/application and any objections.

☐ Parties may request to appear by phone by contacting Chambers prior to the return date.