

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Hearing Date: Oct. 18, 2023 at 10:30 a.m. (EDT)

Objection Deadline: Oct. 4, 2023 at 4:00 p.m. (EDT)

**NOTICE OF HEARING TO CONSIDER APPROVAL OF
DISCLOSURE STATEMENT FOR THE JOINT CHAPTER 11 PLAN
OF LORDSTOWN MOTORS CORP. AND ITS DEBTOR AFFILIATES**

PLEASE TAKE NOTICE THAT on September 1, 2023, the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”) filed the *Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* [D.I. 360] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “**Plan**”)² and the proposed *Disclosure Statement for the Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Debtor Affiliates* [D.I. 361] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the “**Disclosure Statement**”) with the United States Bankruptcy Court for the District of Delaware (the “**Bankruptcy Court**”).

PLEASE TAKE FURTHER NOTICE THAT:

1. The Bankruptcy Court has scheduled a hearing for **October 18, 2023 at 10:30 a.m. (Eastern Daylight Time)** (the “**Disclosure Statement Hearing**”) to determine whether to, among other things, approve the Disclosure Statement as containing “adequate information” within the meaning ascribed to such term in section 1125 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “**Bankruptcy Code**”).

2. The Disclosure Statement Hearing will be held before The Honorable Mary F. Walrath, United States Bankruptcy Judge for the District of Delaware, at the Bankruptcy Court, 824 North Market Street, 5th Floor, Courtroom 4, Wilmington, Delaware 19801. The Disclosure Statement Hearing may be continued from time to time without further notice other than the

¹ The 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 Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² Capitalized terms used, but not otherwise defined, herein have the meanings ascribed to such terms in the Plan.



announcement of the adjourned date(s) at the Disclosure Statement Hearing or any continued hearing or as indicated in any notice of agenda of matters scheduled for hearing filed with the Bankruptcy Court. If the Disclosure Statement Hearing is continued, the Debtors will post the new date and time of the Disclosure Statement Hearing at <https://www.kccllc.net/lordstown>. The Disclosure Statement and Plan may be modified, if necessary, in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and other applicable law, before, during, or as a result of the Disclosure Statement Hearing, without further notice to creditors or other parties in interest.

3. Copies of the Disclosure Statement and Plan are available for review free-of-charge on the website maintained by the Debtors' claims, noticing, and solicitation agent, Kurtzman Carson Consultants LLC, at <https://www.kccllc.net/lordstown>. Copies of the Disclosure Statement and Plan are also available upon request by contacting Kurtzman Carson Consultants LLC through the following link at www.kccllc.net/lordstown/inquiry or by telephone at (877) 709-4757 (Toll-Free) or (424) 236-7235 (International).

4. Responses and objections, if any, to approval of the Disclosure Statement or the other relief sought by the Debtors in connection with the approval of the Disclosure Statement, must: (a) be in writing; (b) state the name and address of the objecting party and the nature of the Claim or Equity Interest held by such party; (c) state with particularity the basis and nature of any objection or response and include, where appropriate, proposed language to be inserted in the Disclosure Statement to resolve any such objection or response; and (d) be filed, together with proof of service, with the Bankruptcy Court and served so as to be actually received on or before **October 4, 2023 at 4:00 p.m. (Eastern Daylight Time)** by:

- a. counsel to the Debtors, (i) White & Case LLP, 200 South Biscayne Boulevard, Suite 4900, Miami, FL 33131 (Attn: Thomas E Lauria (tlauria@whitecase.com), Matthew C. Brown (mbrown@whitecase.com), and Fan B. He (fhe@whitecase.com)); (ii) White & Case LLP, 1221 Avenue of the Americas New York, NY 10020 (Attn: David M. Turetsky (david.turetsky@whitecase.com)); (iii) White & Case LLP, 111 South Wacker Drive, Suite 5100, Chicago, IL 60606 (Attn: Jason N. Zakia (jzakia@whitecase.com)); and (iv) White & Case LLP, 555 South Flower Street, Suite 2700, Los Angeles, CA 90071 (Attn: Roberto Kampfner (rkampfner@whitecase.com), Doah Kim (doah.kim@whitecase.com), and RJ Szuba (rj.szuba@whitecase.com));
- b. proposed counsel to the Debtors, Richards, Layton & Finger, P.A., One Rodney Square, 920 North King Street, Wilmington, DE 19801 (Attn: Kevin Gross (Gross@rlf.com), Daniel J. DeFranceschi (DeFranceschi@rlf.com), Paul N. Heath (Heath@rlf.com), Amanda R. Steele (Steele@rlf.com), and Jason M. Madron (Madron@rlf.com));
- c. counsel to the Official Committee of Unsecured Creditors, (i) Troutman Pepper Hamilton Sanders LLP, Hercules Plaza, Suite 5100, 1313 N. Market Street, Wilmington, DE 19801 (Attn: David M. Fournier (david.fournier@troutman.com), Marcy J. McLaughlin Smith

(marcy.smith@troutman.com), and Tori L. Remington (tori.remington@troutman.com)); (ii) Troutman Pepper Hamilton Sanders LLP, 3000 Two Logan Square, 18th & Arch Streets, Philadelphia, PA 19103-2799 (Attn: Francis J. Lawall (francis.lawall@troutman.com)); (iii) Troutman Pepper Hamilton Sanders LLP, 875 Third Avenue, New York, NY 10022 (Attn: Deborah Kovsky-Apap (deborah.kovsky@troutman.com)); and (iv) Troutman Pepper Hamilton Sanders LLP, 4000 Town Center, Suite 1800, Southfield, MI 48075 (Attn: Sean P. McNally (sean.mcnally@troutman.com)); and

- d. the Office of The United States Trustee for the District of Delaware, 844 King Street, Suite 2207, Wilmington, DE 19801 (Attn: Benjamin A. Hackman (Benjamin.A.Hackman@usdoj.gov)).

5. IF ANY OBJECTION TO THE DISCLOSURE STATEMENT IS NOT FILED AND SERVED AS PRESCRIBED HEREIN, THE OBJECTING PARTY MAY BE BARRED FROM OBJECTING TO THE ADEQUACY OF THE DISCLOSURE STATEMENT AND MAY NOT BE HEARD AT THE HEARING.

6. THIS NOTICE IS NOT A SOLICITATION OF VOTES TO ACCEPT OR REJECT THE PLAN. VOTES ON THE PLAN MAY NOT BE SOLICITED UNLESS AND UNTIL THE PROPOSED DISCLOSURE STATEMENT IS APPROVED BY AN ORDER OF THE COURT.

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Dated: September 1, 2023

Respectfully submitted,

/s/ James F. McCauley

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