

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

In re:

Nu Ride Inc., *et al.*,

Reorganized Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Objection Deadline: May 21, 2024**

**Hearing Date: June 11, 2024 at 10:30 a.m. (ET)**

**OHIO CLASS COUNSEL’S MOTION FOR AN AWARD OF ATTORNEYS’ FEES AND  
PAYMENT OF EXPENSES IN CONNECTION WITH THE OHIO SECURITIES  
LITIGATION SETTLEMENT**

Labaton Keller Sucharow LLP (“**Ohio Class Counsel**”), on behalf of itself and other Plaintiffs’ counsel, hereby respectfully moves for an Order, pursuant to Rule 23(h) of the Federal Rules of Civil Procedure, made applicable hereto, for settlement purposes only, by Bankruptcy Rule 7023: (a) awarding attorneys’ fees in the amount of 30% of the Ohio Securities Litigation Settlement Fund; (b) awarding litigation expenses in the amount of \$1,288,866.60, to be paid from the Ohio Securities Litigation Settlement Fund; (c) approving Class Representative’s request for payment of his costs and expenses related to his representation of the Ohio Settlement Class in the amount of \$15,000, pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4(a)(4), to be paid from the Ohio Securities Litigation Settlement Fund; and (d) for such other and further relief as this Court deems just and proper.

The Court previously scheduled a hearing on this Motion for June 11, 2024 at 10:30 a.m. (ET) via Zoom, unless otherwise directed by the Court, in Courtroom 4, 824 N. Market Street, 5<sup>th</sup> Floor, Wilmington, DE 19801.



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The Motion is supported by, and Ohio Class Counsel hereby incorporates by reference, Ohio Class Counsel's Memorandum of Law and the Declaration of Jake Bissell-Linsk in Support of (I) Class Representative's Motion for Approval of the Ohio Securities Litigation Settlement on a Final Basis and Plan of Allocation and (II) Ohio Class Counsel's Motion for an Award of Attorneys' Fees and Payment of Expenses, dated May 7, 2024, with annexed exhibits, filed contemporaneously herewith.

Ohio Class Counsel will file a proposed form of order on June 4, 2024, together with counsel's reply papers, after the deadline for objecting has passed.

DATED: May 7, 2024

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