

**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)

**CLASS REPRESENTATIVE’S MOTION FOR APPROVAL OF
(I) OHIO SECURITIES LITIGATION SETTLEMENT ON A FINAL BASIS AND
(II) THE PROPOSED PLAN OF ALLOCATION FOR SETTLEMENT PROCEEDS**

George Troicky (“**Ohio Securities Litigation Lead Plaintiff**” or “**Class Representative**”), on behalf of himself and all members of the Ohio Settlement Class, by and through undersigned counsel, hereby respectfully moves for Orders, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, made applicable hereto, for settlement purposes only, by Bankruptcy Rule 7023: (i) approving the settlement (the “**Ohio Securities Litigation Settlement**” or “**Settlement**”) on a final basis; and (ii) approving the proposed plan for allocating of the proceeds of the Settlement (the “**Ohio Settlement Plan of Allocation**” or “**Plan of Allocation**”). 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, 5th Floor, Wilmington, DE 19801.

The Motion is supported by, and Class Representative hereby incorporates by reference, Class Representative’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



231083124050700000000004

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.

Class Representative will file proposed forms of orders on June 4, 2024, together with Class Representative's reply papers, after the deadline for objecting and requesting exclusion from the Settlement Class has passed.

DATED: May 7, 2024

CROSS & SIMON, LLC

/s/ Christopher P. Simon
Christopher P. Simon (No. 3697)
1105 North Market Street, Suite 901
Wilmington, DE 19801
Telephone: (302) 777-4200
Facsimile: (302) 777-4224
csimon@crosslaw.com

- and -

LOWENSTEIN SANDLER LLP

Michael S. Etkin, Esq.
Andrew Behlmann, Esq.
Scott Cargill, Esq.
Collen M. Restel, Esq.
One Lowenstein Drive
Roseland, New Jersey 07068
Telephone 973-597-2500
metkin@lowenstein.com
abehlmann@lowenstein.com
scargill@lowenstein.com
crestel@lowenstein.com

*Bankruptcy Counsel for Class Representative and
the Ohio Settlement Class*

- and -

LABATON KELLER SUCHAROW LLP

Carol C. Villegas, Esq.
David J. Schwartz, Esq.

Jake Bissell-Linsk, Esq.
140 Broadway, 34th Floor
New York, NY 10005
Telephone: (212) 907-0700
Facsimile: (212) 818-0477
cvillegas@labaton.com
dschwartz@labaton.com
jbissell-linsk@labaton.com

*Class Counsel for Class Representative and
the Ohio Settlement Class*