

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

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Lordstown Motors Corp. and Lordstown EV
Corporation,

Plaintiffs,

-against-

Hon Hai Precision Industry Co., Ltd. (a/k/a Hon
Hai Technology Group), Foxconn EV Technology,
Inc., Foxconn Ventures Pte. Ltd., Foxconn (Far
East) Limited, and Foxconn EV System LLC

Defendants.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Adv. Pro. No. 23-50414 (MFW)

Re: Adv. Proc. D.I. 1, 3 & 5

ORDER APPROVING STIPULATION EXTENDING RESPONSE DEADLINE

Upon consideration of the *Stipulation Further Extending Response Deadline* (the “**Stipulation**”),² a copy of which is attached hereto as **Exhibit 1**; and the Court having determined that good and adequate cause exists for approval of the Stipulation;

IT IS HEREBY ORDERED THAT:

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) (collectively, the “**Debtors**”). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² Capitalized terms not defined herein shall have the meaning ascribed to such terms in the Stipulation.



231083123082900000000005

1. The Stipulation is approved.
2. The time within which Foxconn may answer, move, or otherwise respond to the Complaint is hereby extended to and including September 29, 2023 (the “**Response Deadline**”).
3. All other applicable deadlines and obligations under the Local Rules for the United States Bankruptcy Court for the District of Delaware, the Federal Rules of Civil Procedure, and the Federal Rules of Bankruptcy Procedure, including under Bankruptcy Rules 7016 and 7026, are tolled and extended, to the extent necessary, by an equivalent period as the Response Deadline.

Dated: August 21st, 2023
Wilmington, Delaware

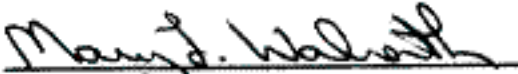

MARY F. WALRATH
UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

Stipulation

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

| | |
|---|---|
| In re | Chapter 11 |
| Lordstown Motors Corp., <i>et al.</i> , ¹ | Case No. 23-10831 (MFW) |
| Debtors. | (Jointly Administered) |
| Lordstown Motors Corp. and Lordstown EV Corporation, | Adv. Pro. No. 23-50414 (MFW) |
| Plaintiffs, | Re: Adv. Proc. D.I. 1, 3 & 5 |
| -against- | |
| Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., Foxconn Ventures Pte. Ltd., Foxconn (Far East) Limited, and Foxconn EV System LLC | |
| Defendants. | |

STIPULATION FURTHER EXTENDING RESPONSE DEADLINE

Lordstown Motors Corp. (“**Lordstown**” or “**Company**”) and Lordstown EV Corporation (collectively, “**Plaintiffs**”), and Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV Systems LLC (collectively, “**Foxconn**”, and together with Plaintiffs, the “**Parties**”), by and through their respective undersigned counsel, hereby stipulate and agree (the “**Stipulation**”) as follows:

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) (collectively, the “**Debtors**”). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

WHEREAS, on June 27, 2023, Plaintiffs filed the *Complaint* [A.D.I. 1] (the “**Complaint**”) with the United States Bankruptcy Court for the District of Delaware (the “**Bankruptcy Court**”);

WHEREAS, on June 30, 2023, Plaintiffs filed the *Summons and Notice of Pretrial Conference in an Adversary Proceeding* [A.D.I. 3] (the “**Summons**”), under which Foxconn’s initial deadline to answer, move, or otherwise respond to the Complaint was July 31, 2023 (the “**Response Deadline**”),² and a pretrial conference was scheduled to be held on a date to be determined;

WHEREAS, On July 31, the Court entered an order [A.D.I. 5] approving the Parties’ *Stipulation Extending Response Deadline*, under which the Parties agreed to extend the Response Deadline to and including September 1, 2023;

WHEREAS, the Parties have engaged in further discussions regarding the Complaint and the Response Deadline, and agreed to further extend the Response Deadline as set forth herein;

WHEREAS, the Parties expressly preserve and do not waive, prejudice, release, or otherwise lose any available claims or defenses, including jurisdictional and sufficiency of service defenses, that may be available under the Federal Rules of Civil Procedure (the “**Civil Rules**”), the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), or any other rules, statutory or common law claim, or defense;

² The 30th day following the issuance of the Summons is July 30, 2023; however, as that date falls on a Sunday, pursuant to Federal Rule of Bankruptcy Procedure 9006(a)(1)(C), the Response Deadline extends to Monday, July 31, 2023.

NOW, THEREFORE, in consideration of the foregoing recitals, and good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties, intending to be legally bound, hereby stipulate and agree as follows:

1. The above recitals are true and correct and are incorporated by reference.
2. The Response Deadline shall be extended to and including September 29, 2023.
3. All other applicable deadlines and obligations under the Local Rules for the United States Bankruptcy Court for the District of Delaware, the Civil Rules, and the Bankruptcy Rules, including under Bankruptcy Rules 7016 and 7026, are tolled and extended, to the extent necessary, by an equivalent period as the Response Deadline.

[Remainder of page intentionally left blank]

Dated: August 18, 2023
Wilmington, Delaware

/s/ Cory D. Kandestin

RICHARDS, LAYTON & FINGER, P.A.

Kevin Gross (No. 209)
Daniel J. DeFranceschi (No. 2732)
Paul N. Heath (No. 3704)
Amanda R. Steele (No. 5530)
Jason M. Madron (No. 4431)
Cory D. Kandestin (No. 5025)
One Rodney Square
920 N. King Street
Wilmington, DE 19801
Telephone: (302) 651-7700
Facsimile: (302) 651-7701
Email: gross@rlf.com
defranceschi@rlf.com
heath@rlf.com
steele@rlf.com
madron@rlf.com
kandestin@rlf.com

- and -

WHITE & CASE LLP

Thomas E Lauria (admitted *pro hac vice*)
Matthew C. Brown (admitted *pro hac vice*)
Fan B. He (admitted *pro hac vice*)
200 South Biscayne Boulevard, Suite 4900
Miami, FL 33131
Telephone: (305) 371-2700
tlauria@whitecase.com
mbrown@whitecase.com
fhe@whitecase.com

David M. Turetsky (admitted *pro hac vice*)
1221 Avenue of the Americas
New York, NY 10020
Telephone: (212) 819-8200
david.turetsky@whitecase.com

/s/ Matthew O. Talmo

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

Robert J. Dehney (No. 3578)
Matthew B. Harvey (No. 5186)
Matthew O. Talmo (No. 6333)
1201 North Market Street, 16th Flr.
P.O. Box 1347
Wilmington, DE 19899-1347
Telephone: 302.658.9200
Email: rdehney@morrisnichols.com
mharvey@morrisnichols.com
mtalmo@morrisnichols.com

-and-

PAUL HASTINGS LLP

Matthew M. Murphy (admitted *pro hac vice*)
Matthew Micheli (admitted *pro hac vice*)
Michael C. Whalen
71 South Wacker Drive, Suite 4500
Chicago, Illinois 60606
Telephone: (312) 499-6000
Facsimile: (312) 499-6100
Email: mattmurphy@paulhastings.com
mattmicheli@paulhastings.com
michaelcwhalen@paulhastings.com

-and-

Mike F. Huang
Kevin P. Broughel (admitted *pro hac vice*)
200 Park Avenue
New York, New York 10166
Telephone: (212) 318-6000
Facsimile: (212) 319-4090
Email: mikehuang@paulhastings.com
kevinbroughel@paulhastings.com

Counsel to Foxconn

Jason N. Zakia (admitted *pro hac vice*)
111 South Wacker Drive, Suite 5100
Chicago, IL 60606
Telephone: (312) 881-5400
jzakia@whitecase.com

Roberto Kampfner (admitted *pro hac vice*)
Doah Kim (admitted *pro hac vice*)
RJ Szuba (admitted *pro hac vice*)
555 South Flower Street, Suite 2700
Los Angeles, CA 90071
Telephone: (213) 620-7700
rkampfner@whitecase.com
doah.kim@whitecase.com
rj.szuba@whitecase.com

Counsel for Plaintiffs