

**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)

Related D.I.: 1203-1207

**SUPPLEMENTAL DECLARATION OF PAUL MULHOLLAND CONCERNING
(A) DISSEMINATION OF THE POSTCARD NOTICE; AND (B) REPORT ON
REQUESTS FOR EXCLUSION AND OBJECTIONS RECEIVED TO DATE**

I, Paul Mulholland, declare as follows, under penalty of perjury pursuant to 28 U.S.C. §1746:

1. I am the President of Strategic Claims Services (“SCS”), a nationally recognized class action administration firm. I have over thirty years of experience specializing in the administration of class action cases. SCS was established in April 1999 and has administered over five-hundred twenty-five (525) class action cases since its inception. I have personal knowledge of the facts set forth herein and, if called on to do so, I could and would testify competently thereto.

UPDATE ON DISSEMINATION OF THE POSTCARD NOTICE

2. Pursuant to the *Order (I) Confirming Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors and (II) Granting Related Relief* of the U.S. Bankruptcy Court for the District of Delaware (“**Bankruptcy Court**”), dated March 6, 2024 (Dkt No. 1069, the “**Confirmation Order**”), the Bankruptcy Court approved the retention of SCS as the claims administrator (“**Ohio Settlement Claims Administrator**” or “**Claims Administrator**”) in connection with the Ohio Securities Litigation Settlement in the above-referenced proceedings (the “**Chapter 11 Cases**”). I submit this declaration as a

supplement to the previously filed Declaration of Paul Mulholland Concerning: (A) Dissemination of the Postcard Notice; (B) Publication of the Summary Notice; and (C) Report on Requests for Exclusion and Objections Received to Date, dated May 7, 2024 (Dkt No. 1207-2, the “Initial Mailing Declaration”) in order to provide the Court with updated information regarding the dissemination of notice to potential Ohio Settlement Class Members, as well as updates concerning other aspects of the Ohio Securities Litigation Settlement administration process.¹

3. As previously reported, the Postcard Notice was mailed or a direct link to the settlement webpage, a long-form Notice of Certification of Settlement Class, Proposed Settlement, and Motion for Attorneys’ Fees and Expenses (the “**Notice**”) and Ohio Securities Litigation Proof of Claim Form (the “**Ohio Claim Form**”) (collectively, the “**Notice Packet**”), and the Postcard Notice, was emailed by SCS or nominees to 450,559 potential Ohio Settlement Class Members. Since the Initial Mailing Declaration, SCS received an additional 300 names and addresses of potential Settlement Class Members, SCS received a request from a nominee for 700 Postcard Notices, and SCS was notified that a nominee emailed an additional 21,563 emails with the direct link to the settlement webpage, Notice Packet, and Postcard Notice. In total, as of the date of this declaration, 473,122 potential Settlement Class Members or their

¹ The primary terms of the Settlement are in the: (i) *Third Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors* (together with all schedules and exhibits thereto, and as the same may be modified in accordance with its terms, the “**Plan**”); (ii) the *Stipulation Between Debtors, Ohio Securities Litigation Lead Plaintiff, Official Committee of Unsecured Creditors, and Official Committee of Equity Security Holders Regarding Ohio Securities Litigation Lead Plaintiff’s Motion To Apply Bankruptcy Rule 7023 To Class Claims and Proofs of Claim Numbers 1368, 1379, 1380, 1394, 1426, and 1434* (the “**7023 Stipulation**”), which was so ordered by the Bankruptcy Court on February 5, 2024; and (3) the Confirmation Order. All capitalized terms not defined herein have the same meanings as in the Plan, the 7023 Stipulation, the Confirmation Order, or the proposed Plan of Allocation, which is reported in paragraphs 39 to 72 of the long-form notice of the Settlement (the “**Notice**”), attached as Exhibit B to the Initial Mailing Declaration.

nominees were notified of the Settlement by either mailed Postcard Notice or emailed direct link to the settlement webpage, Notice Packet, and Postcard Notice.

4. Since the Initial Mailing Declaration, 2,871 Postcard Notices were returned as undeliverable. Of these, the United States Postal Service provided forwarding addresses for an additional 69 Postcard Notices, and SCS immediately mailed another Postcard Notice to the updated addresses. The remaining 2,802 Postcard Notices returned as undeliverable were “skip-traced” by SCS to obtain updated addresses and 1,663 were re-mailed to the updated addresses.

UPDATE ON WEBSITE

5. The Initial Mailing Declaration noted that on March 21, 2024, SCS’s website, www.strategicclaims.net, was updated to include a specific webpage for the Ohio Securities Litigation Settlement. The webpage is accessible 24 hours a day, 7 days a week and contains the current status of the case, important Settlement-related deadlines, an online claim filing portal, and downloadable copies of the documents. On May 10, 2024, SCS posted Class Representative’s Memorandum Law in Support of Motion for Approval of (I) Ohio Securities Litigation Settlement on a Final Basis and (II) the Proposed Plan of Allocation for Settlement Proceeds, Ohio Class Counsel’s Memorandum of Law in Support of Motion for an Award of Attorneys’ Fees and Payment of Expenses in Connection with the Ohio Securities Litigation Settlement, 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 (Dkt Nos. 1204, 1206, and 1207). To date, there have been 78,864 pageviews by 20,894 unique users. SCS will continue to maintain and, as appropriate, update the Settlement webpage with relevant case information until the conclusion of the administration process.

UPDATE ON EXCLUSIONS AND OBJECTIONS RECEIVED TO DATE

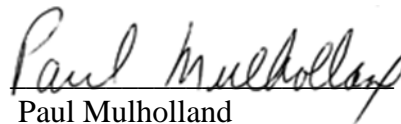
6. The Postcard Notice, Notice, Summary Notice, and the Settlement webpage informed potential Settlement Class Members that written requests for exclusion from the Ohio Settlement Class were to be received no later than May 21, 2024.

7. SCS has been monitoring all mail received for this case. At the time of the submission of the Initial Mailing Declaration, SCS had received one invalid request for exclusion. The redacted copy of the request was attached as Exhibit D to the Initial Mailing Declaration. Since the Initial Mailing Declaration, SCS has received no additional requests for exclusion and no response from the invalid exclusion request previously filed.

8. According to the Postcard Notice, Notice, Summary Notice, and Settlement webpage, Ohio Settlement Class Members seeking to object to the Settlement, the Ohio Settlement Plan of Allocation, and/or the Ohio Fee and Expense Application were required to submit their objection no later than May 21, 2024. As of the date of this declaration, SCS has not received any objections.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 4th day of June 2024, in Media, Pennsylvania.


Paul Mulholland