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HONORABLE TIMOTHY W. DORE
Chapter 15

Attorneys for FTI Consulting Canada Inc.,
Foreign Representative

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON, SEATTLE

In re

VICINITY MOTOR CORP., *et al.*,¹

Debtors in a Foreign Proceeding.

Lead Case No. 24-12675

Joint Administration Motion Pending with:
Case No. 24-12677;
Case No. 24-12678; and
Case No. 24-12679

NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Bankruptcy Procedure 9010, Todd M. Brannon of Ballard Spahr LLP hereby enters his Notice of Appearance on behalf of FTI Consulting Canada Inc., and requests that copies of all pleadings and notices hereinafter filed or given in the above-referenced proceedings be delivered to the undersigned attorneys at their office below stated. Attorneys Gregory R. Fox and James B. Zack remain as counsel for FTI Consulting Canada Inc..

Todd M. Brannon
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¹ The Debtors are Vicinity Motor Corp., Bankruptcy Case No. 24-12675, Vicinity Motor (Bus) Corp., Bankruptcy Case No. 24-12677, Vicinity Motor (Bus) USA Corp., Bankruptcy Case No. 24-12678, and Vicinity Motor Property, LLC, Bankruptcy Case No. 24-12679.

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6 PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any
7 subsequent appearance, pleading, claim, or suit is intended to waive the rights of FTI Consulting
8 Canada Inc. to (i) have final orders in non-core matters entered only after *de novo* review by a
9 United States District Judge, (ii) trial by jury in any proceeding so triable herein or in any other
10 case, controversy, or proceeding related hereto, (iii) have the reference withdrawn by the District
11 Court in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights,
12 claims, actions, defenses, setoff, or recoupments to which FTI Consulting Canada Inc. is or may
13 be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses,
14 setoffs, and recoupments FTI Consulting Canada Inc. expressly reserves.

15 DATED as of this 11th day of April, 2025.

16 BALLARD SPAHR LLP

17 By: s/ Todd M. Brannon

18 Gregory R. Fox, WSBA No. 30559

19 James B. Zack, WSBA No. 48122

20 Todd M. Brannon, WSBA No. 59755

21 *Attorneys for FTI Consulting Canada Inc.,*
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