

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

In re:

HC LIQUIDATING, INC.,

Debtor.¹

Chapter 11

Case No. 23-10259 (TMH)

Re Docket Nos. 360 & 379

**ORDER (I) ESTABLISHING DEADLINES FOR THE FILING
OF PROOFS OF CLAIM AND REQUESTS FOR ALLOWANCE OF
ADMINISTRATIVE EXPENSE CLAIMS, (II) APPROVING THE FORMS AND
MANNER OF NOTICE THEREOF, AND (III) GRANTING RELATED RELIEF**

Upon consideration of the motion (the “Motion”)² of the Debtor, pursuant to sections 501, 502, 503, and 1111(a) of the Bankruptcy Code, Bankruptcy Rules 2002, 3002(a), 3003(c)(3), and 5005(a), and Local Rules 1009-2, 2002-1, and 3003-1(a), for entry of an order (i) establishing deadlines for filing proofs of claim and requests for allowance of administrative expense claims in this Chapter 11 Case, (ii) approving the forms and manner of notice thereof, and (iii) granting related relief; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated as of February 29, 2012; and it appearing that this is a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion and the hearing thereon having been given as set forth in the Motion; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion; and it appearing that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interests of the Debtor, its estate, creditors, and all parties in interest; and after due deliberation and sufficient cause appearing therefor,

¹ The last four digits of the Debtor’s federal tax identification numbers are 0487. The Debtor’s mailing address is 1001 Wilshire Boulevard PMB 2196, Los Angeles, CA 90017.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Bar Date Order.

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. Each person or entity, including, without limitation, each individual, partnership, joint venture, corporation, limited liability company, estate, trust, or governmental unit (as defined in section 101(27) of the Bankruptcy Code) that holds or asserts a claim, as defined in section 101(5) of the Bankruptcy Code, against the Debtor shall file a separate Proof of Claim or Payment Request, as applicable, in the Chapter 11 Case through the Debtor's claims and noticing agent, Donlin Recano.
3. Proofs of Claim or Payment Requests shall be filed by the holder of the claim (the "Creditor") or an authorized representative of the Creditor. Any Proof of Claim or Payment Request submitted by an authorized representative of the Creditor shall state the basis for such authorization. Any person seeking to file a Proof of Claim or Payment Request on behalf of a Creditor without express written authorization shall seek authorization from this Court prior to the applicable Bar Date.
4. **General Bar Date.** Except as otherwise provided herein, any person or entity (excluding any governmental unit) asserting a claim against the Debtor in this Chapter 11 Case, including any claim arising under section 503(b)(9) of the Bankruptcy Code, shall file a completed and executed Proof of Claim, substantially in the form attached hereto as **Exhibit 2**, so that it is received, in the manner provided in paragraphs 11 – 13 below, by Donlin Recano, the Court-approved claims and noticing agent in this Chapter 11 Case, on or before the General Bar Date to be designated by the Debtor, which shall be thirty (30) days after service of the Bar Date Notice at 5:00 p.m. (prevailing Eastern Time). The Debtor shall include the designated General Bar Date in the Bar Date Notice and shall file the Bar Date Notice making the designated General Bar Date a matter of record. The Debtor is authorized, but not required, to agree to extend the General Bar Date for any claimant without further order of the Court.
5. **Administrative Claim Bar Date.** Except as otherwise provided herein, any person or entity that holds or wishes to assert an administrative expense claim pursuant to section 503(b)

of the Bankruptcy Code (except those claims arising under section 503(b)(9)) that arose during the period from the Petition Date through and including the date of the Hearing, shall file a completed and executed Payment Request, substantially in the form attached hereto as **Exhibit 3**, so that it is received, in the manner provided in paragraphs 11 – 13 below, by Donlin Recano on or before the Administrative Claim Bar Date to be designated by the Debtor, which shall be thirty (30) days after service of the Bar Date Notice at 5:00 p.m. (prevailing Eastern Time). The Debtor shall include the designated Administrative Claim Bar Date in the Bar Date Notice and shall file the Bar Date Notice making the designated Administrative Claim Bar Date a matter of record. The Debtor is authorized, but not required, to agree to extend the Administrative Bar Date for any claimant without further order of the Court.

6. **Governmental Bar Date.** All governmental units (as defined in section 101(27) of the Bankruptcy Code) asserting claims against the Debtor shall file completed and executed Proofs of Claim, substantially in the form attached hereto as **Exhibit 2**, so they are received, in the manner provided in paragraphs 11 – 13 below, by Donlin Recano on or before the Governmental Bar Date to be designated by the Debtor, which shall be the later of: (i) thirty (30) days after service of the Bar Date Notice at 5:00 p.m. (prevailing Eastern Time); or (ii) August 23, 2023 at 5:00 pm (prevailing Eastern Time) .

7. **Amended Schedule Bar Date.** If, on or after the date on which the Debtor serves the Bar Date Notice, the Debtor amends or supplements its Schedules to (a) change the amount, nature, classification or characterization of a claim, or (b) add a new claim to the Schedules, the affected claimant shall file a completed and executed Proof of Claim, substantially in the form attached hereto as **Exhibit 2**, or amend any previously-filed Proof of Claim in respect of the amended scheduled claim in accordance with the procedures described herein so that it is received, in the manner provided in paragraphs 11 – 13 below, by Donlin Recano on or before the later of (a) the General Bar Date and (b) twenty-one (21) days after the claimant is served with notice of the applicable amendment or supplement to the Schedules. If the Debtor amends its Schedules with respect to the claim of a governmental unit, the affected governmental unit shall be permitted

to dispute the amount, nature, classification, or characterization of the scheduled claim by filing with Donlin Recano a completed and executed Proof of Claim, substantially in the form attached hereto as **Exhibit 2**, on or before the later of (a) the Governmental Bar Date and (b) twenty-one (21) days after the governmental unit is served with notice of the applicable amendment or supplement to the Schedules.

8. **Rejection Bar Date.** In the event that the Debtor rejects executory contracts or unexpired leases pursuant to section 365 of the Bankruptcy Code, completed and executed Proofs of Claim, substantially in the form attached hereto as **Exhibit 2**, shall be filed in connection with any rejection damages claims so that they are received, in the manner provided in paragraphs 11 and 12 below, by Donlin Recano on or before the later of (a) the General Bar Date and (b) thirty (30) days after the effective date of such rejection established in a Court order authorizing such rejection; provided, however, that persons or entities asserting claims with respect to contracts or leases that are not related to rejection damages claims must file Proofs of Claim on account of such claims by the General Bar Date.

9. **Equity Holders.** Any person or entity holding an equity security or other ownership interest in the Debtor (an “**Interest Holder**”) is not required to file a proof of interest with respect to the ownership of such equity interest; provided, however, that any Interest Holder that wishes to assert a claim against the Debtor, including a claim that arises out of or relates to the ownership or purchase of an equity security or other ownership interests, including, but not limited to, a claim for damages, rescission based on the purchase or sale of such equity security or other ownership interests, must file a proof of claim on or prior to the General Bar Date, or the Governmental Bar Date, as applicable to such claim, pursuant to procedures set forth herein. The Debtor’s rights are reserved to seek relief at a later date establishing a deadline for Interest Holders to file proofs of interest.

10. After the initial mailing of the Bar Date Notice, the Debtor may make supplemental mailings of notices, in its discretion, including in the event that: (a) notices are returned by the post

office with forwarding addresses;³ (b) certain parties, acting on behalf of parties in interest (e.g., banks and brokers with respect to equity or interest holders), decline to pass along notices to these parties and instead return their names and addresses to the Debtor for direct mailing; and (c) additional potential claimants become known as the result of the Bar Date noticing process. In this regard, the Debtor requests that the Court permit it to make supplemental mailings of the Bar Date Notice in these and similar circumstances at any time up to twenty-one (21) days in advance of the Bar Date, with any such mailings deemed timely and the Bar Date being applicable to the recipient creditors.

11. Proofs of Claim and Payment Requests must be sent (a) by first-class mail to Donlin Recano at: Donlin, Recano & Company, Inc., Re: HyreCar, Inc., P.O. Box 199043, Blythebourne Station, Brooklyn, NY 11219; (b) by overnight mail or hand delivery to Donlin Recano at: Donlin, Recano & Company, Inc., Re: HyreCar, Inc., 6201 15th Avenue, Brooklyn, NY 11219; or (c) electronically by submitting a Proof of Claim or Payment Request through Donlin Recano's website, <https://donlinrecano.com/hyrecar>.

12. Proofs of Claim and Payment Requests sent by mail, overnight mail, courier, or hand delivery in paper must be original and contain original signatures.

13. Proofs of Claim and Payment Requests mailed or delivered to Donlin Recano, or submitted electronically through Donlin Recano's website, will be deemed timely filed only if actually received by Donlin Recano on or before the Bar Date associated with such claim at the address listed in paragraph 11 above.

14. Donlin Recano will only accept Proofs of Claim property submitted pursuant to paragraphs 11 and 12, above. Donlin Recano shall not accept Proofs of Claim or Payment Requests by facsimile, telecopy, email, or electronic submission (other than through submission at Donlin Recano's website as provided in paragraph 11). Proofs of Claim or Payment Requests submitted by such unapproved means shall not be deemed timely filed.

³ However, if notices are returned as "return to sender" without a forwarding address, the Debtor is not required to mail additional notices to such entity or persons.

15. The following persons or entities whose claims otherwise would be subject to the General Bar Date, are not required to file Proofs of Claim:

- a) any person or entity that already has filed a Proof of Claim against the Debtor with Donlin Recano or the Clerk of the Court in a form substantially similar to Official Bankruptcy Form B 410;
- b) any person or entity whose claim is listed on the Debtor's Schedules or any amendments thereto unless (i) the claim is scheduled as "disputed," "contingent," or "unliquidated;" or (ii) the claimant disagrees with the amount, nature, and/or priority of the claim as set forth in the Schedules. In the case of either (i) or (ii), a Proof of Claim must be filed on or before the applicable Bar Date;
- c) professionals retained by the Debtor and the Committee, pursuant to orders of the Court, that assert administrative claims for fees and expenses subject to the Court's approval pursuant to sections 330, 331, and 503(b) of the Bankruptcy Code;
- d) a claim on account of indemnification, contribution, or reimbursement by an officer, director, or employee of the Debtor who held such position as of the Petition Date; provided, however, that any director, officer, or employee of the Debtor as of the Petition Date that resigns or otherwise leaves the employment of the Debtor following the Petition Date must file a proof of claim by the later of (i) the General Bar Date or (ii) thirty (30) days following such resignation or termination of employment if such director, officer, or employee of the Debtor asserts a claim against the Debtor for indemnification, contribution, or for reimbursement related to the foregoing;
- e) a holder of a claim that has previously been allowed by order of the Court;

- f) a holder of a claim that has been paid in full by the Debtor or any other party, including but not limited to claims authorized to be paid pursuant to the Critical Vendor Order or Insurance Order;
- g) Any unpaid Pre-2023 Drivers' Liability Claims but only to the extent such claims have by the Bar Date been paid by Insurers providing coverage for Pre-2023 Drivers' Liability Claims; and
- h) any present or former employee of the Debtor, solely with respect to any claim based on the payment of an obligation arising in the ordinary course of business as a wage, commission, or benefit and previously authorized to be paid by any orders granting the *Debtor's Motion for Entry of Interim and Final Orders Authorizing Debtor to (I) Pay Prepetition Wages, Employee Expenses, and Other Compensation, (II) Maintain Employee Benefit Programs, and (III) Granting Related Relief* [Docket No. 10;].

16. Additionally, the following claims are not required to be filed on or before the Administrative Claim Bar Date:

- a) Administrative Expense Claims that (i) have been previously paid by the Debtor in the ordinary course of the Debtor's business or (ii) have otherwise been allowed by order of the Court;
- b) Administrative Expense Claims previously filed with Donlin Recano or the Court;
- c) Administrative Expense Claims held by a person or entity that filed a motion requesting allowance of such Administrative Expense Claim prior to the date of the Hearing;
- d) Administrative Expense Claims of any professional retained and employed by the Debtor pursuant to sections 327, 328, or 1103 of the Bankruptcy Code, including any ordinary course of business professionals retained, pursuant to an order of this Court approving the employment of ordinary

course business professionals, for compensation, indemnification, or reimbursement of costs and expenses relating to professional services performed and expenses incurred on and after the Petition Date;

- e) claims for fees payable to the Clerk of this Court;
- f) fees payable to the Office of the United States Trustee under 28 U.S.C. § 1930(a)(6) or accrued interest thereon arising under 31 U.S.C. § 3717; and
- g) Administrative Expense Claims arising after the date of the Hearing.

17. The provisions of this Order apply to all claims of whatever character, against the Debtor or its assets, whether secured or unsecured, priority or nonpriority, liquidated or unliquidated, fixed or contingent.

18. Any person or entity that is required to file a timely Proof of Claim or Payment Request in the form and manner specified by this Order and who fails to do so on or before the Bar Date associated with such claim: (a) shall be forever barred, estopped, and enjoined from asserting such claim against the Debtor, its estate, or property of the Debtor, or thereafter filing a Proof of Claim with respect thereto in this Chapter 11 Case, unless otherwise ordered by this Court; (b) shall not, with respect to such claim, be treated as a Creditor of the Debtor for the purposes of voting upon any plan in these proceedings; and (c) shall not receive or be entitled to receive any payment or distribution of property from the Debtor or its successors or assigns with respect to such claim, without further order of this Court.

19. The Bar Date Notice, substantially in the form attached hereto as **Exhibit 1**, the Proof of Claim form, substantially in the form attached hereto as **Exhibit 2**, the Payment Request form, substantially in the form attached hereto as **Exhibit 3**, and the Publication Notice, substantially in the form attached hereto as **Exhibit 4**, are hereby approved in all respects.

20. Subject to paragraph 21 below, the Bar Date Notice shall be deemed good, adequate, and sufficient notice of the relief granted by this Order to all known Creditors of the Debtor if it is served, together with the Proof of Claim form and Payment Request form, by first-class U.S. mail, postage prepaid, no later than thirty (30) days before the General Bar Date, to (a)

all persons and entities (and their counsel if known) known by the Debtor to be holding potential claims or interests in the Debtor, (b) all parties that have requested notice in this Chapter 11 Case, (c) all persons or entities listed in the Schedules, (d) all parties to executory contracts and unexpired leases with the Debtor, (e) all parties to litigation with the Debtor, (f) all parties that have already filed a Proof of Claim or Payment Request against the Debtor, (g) all taxing authorities for the jurisdictions in which the Debtor does business, (h) all governmental units that may have claims against the Debtor, and (i) the United States Trustee.

21. The Debtor is authorized to serve the Bar Date Notice via email to all users of the Debtor's car-sharing platform since January 1, 2021 and such email notice shall be deemed good, adequate, and sufficient notice of the relief granted by this Order to all recipients thereof.

22. The Debtor shall publish the Publication Notice, substantially in the form attached hereto as **Exhibit 4**, in the national edition of one of the following newspapers: *The Wall Street Journal*, *The New York Times*, or *USA Today*, and, solely in the discretion of the Debtor, a regional publication circulated where substantial portions of the Debtor's business are located, at least once no later than twenty-one (21) days prior to the General Bar Date, which Publication Notice is hereby approved in all respects and which shall be deemed good, adequate, and sufficient notice of the Bar Dates by publication.

23. Nothing in this Order shall prejudice the right of the Debtor or any other party in interest herein to dispute, or to assert offsets or defenses to, any claim reflected in the Schedules as to amount, liability, characterization, or otherwise, and to subsequently designate any claim as disputed, contingent, or unliquidated.

24. Nothing in this Order or the Bar Date Notice, or the filing of a Proof of Claim or Payment Request shall impact, implicate or affect any rights or obligations of a claimant, insurer or any other non-debtor third party, regarding any insurance policy or insurance carrier that may provide coverage for any Claim(s) asserted in this Chapter 11 Case, whether or not any such insurance policy was offered to claimant through the Debtor's car-sharing platform. It is the sole responsibility of claimant to timely file a claim against any insurance policy that may be applicable

to a Claim filed against the Debtor, and to pursue any such claim to resolution within the requirements of any such policy. In addition, it is the sole responsibility of the claimant to file a Proof of Claim in this Chapter 11 Case except to the extent such Claim has by the Bar Date been paid by Insurers providing coverage for such Claim.

25. The Debtor is authorized to make non-substantive changes to the exhibits hereto without further order of this Court, including without limitation, changes to (a) correct typographical and grammatical errors, (b) update references to cited pleadings and orders, and (c) conform changes among this Order, the exhibits, and any other related materials prior to their mailing to parties in interest.

26. The Debtor is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

27. This Court retains jurisdiction with respect to all matters arising from or related to the interpretation, implementation, and enforcement of this Order.

Dated: July 12th, 2023
Wilmington, Delaware

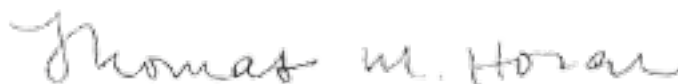

THOMAS M. HORAN
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT I

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

In re:

HC LIQUIDATING, INC.,

Debtor.¹

Chapter 11

Case No. 23-10259 (TMH)

**NOTICE OF DEADLINE FOR FILING PROOFS OF CLAIM AND
REQUESTS FOR ALLOWANCE OF ADMINISTRATIVE CLAIMS**

**YOU ARE RECEIVING THIS NOTICE BECAUSE YOU MAY HAVE A CLAIM
AGAINST THE DEBTOR IN THE ABOVE-CAPTIONED CASE. YOU SHOULD
READ THIS NOTICE CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY. IF
YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.**

Please take notice that on February 24, 2023 (the “Petition Date”), the above-captioned debtor (the “Debtor”), formerly known as HyreCar, Inc., filed a voluntary petition for relief under chapter 11 of title 11 of the U.S. Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”), with the United States Bankruptcy Court for the District of Delaware (the “Court”).

Please take further notice that on [____], 2023, the Court entered an order (the “Bar Date Order”)² establishing: (i) [____], **2023 at 5:00 p.m. (prevailing Eastern Time)** (the “General Bar Date”) as the last date and time for each person or entity to file a Proof of Claim in this Chapter 11 Case (a “Proof of Claim” or “Proofs of Claim,” as applicable), provided that, solely with respect to a governmental unit, the last date and time for such governmental unit to file a Proof of Claim in this Chapter 11 Case is **August 23, 2023 at 5:00 p.m. (prevailing Eastern Time)** (the “Governmental Bar Date”); and (ii) [____], **2023 at 5:00 p.m. (prevailing Eastern Time)** (the “Administrative Claim Bar Date”) as the last date and time for each person or entity to file a request for allowance of an Administrative Expense Claims (a “Payment Request” or “Payment Requests,” as applicable) arising during the period **from the Petition Date through and including July 17, 2023**. For your convenience, enclosed with this Notice is a Proof of Claim form (the “Proof of Claim Form”) and a Payment Request form (the “Payment Request Form”).

THE FACT THAT YOU HAVE RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM AGAINST THE DEBTOR OR THAT THE DEBTOR BELIEVES THAT YOU HAVE A CLAIM AGAINST THE DEBTOR.

Please take further notice that the Bar Date Order and the procedures set forth therein and herein for the filing of Proofs of Claim apply to all Claims (the holder of any such Claim, a “claimant”) that arose, or are deemed to have arisen, prior to the Petition Date, regardless of their character or nature, whether secured or unsecured, priority or non-priority, liquidated or unliquidated, fixed or

¹ The last four digits of the Debtor’s federal tax identification numbers are 0487. The Debtor’s mailing address is 1001 Wilshire Boulevard PMB 2196, Los Angeles, CA 90017.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Bar Date Order.

contingent, including, without limitation, Claims entitled to administrative priority status under section 503(b)(9) of the Bankruptcy Code, no matter how remote or contingent.

As used in this Notice, the term “creditor” has the meaning given to it in section 101(10) of the Bankruptcy Code, and includes all persons, entities, estates, trusts, governmental units and the United States Trustee. In addition, the terms “persons,” “entities” and “governmental units” are defined in sections 101(41), 101(15) and 101(27) of the Bankruptcy Code, respectively.

As used in this Notice, the term “Claim” or “Claims” has the meaning given to it in section 101(5) of the Bankruptcy Code, and includes as to or against the Debtor: (a) any right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured or unsecured; or (b) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured or unsecured.

A. PROOFS OF CLAIM, PAYMENT REQUESTS, AND MANNER OF FILING

i. Proofs of Claim

Except as otherwise provided herein, any person or entity that has or seeks to assert a Claim which arose, or is deemed to have arisen, prior to the Petition Date, including, without limitation, a Claim under section 503(b)(9) of the Bankruptcy Code, **MUST FILE A PROOF OF CLAIM ON OR BEFORE THE APPLICABLE BAR DATE** in order to potentially share in the Debtor’s estate. For the avoidance of doubt, pursuant to Bankruptcy Rule 3003(c)(2), any claimant who asserts a Claim that arose, or is deemed to have arisen, prior to the Petition Date and whose Claim is either (a) not listed on the Debtor’s Schedules or (b) is listed on the Schedules as “disputed,” “contingent,” or “unliquidated,” shall be required to file a Proof of Claim on or prior to the applicable Bar Date in order to potentially share in the Debtor’s estate. Under the Bar Date Order, the filing of a Proof of Claim Form shall be deemed to also satisfy the procedural requirements for the assertion of administrative priority Claims under section 503(b)(9) of the Bankruptcy Code. All other administrative Claims under section 503(b) of the Bankruptcy Code must be made pursuant to the procedures below and shall not be deemed proper if made by Proof of Claim. Acts or omissions of the Debtor that occurred or arose before the Petition Date may give rise to Claims that must be filed by the applicable Bar Date, notwithstanding that such Claims may not have matured, are contingent, or have not become fixed or liquidated prior to or as of the Petition Date.

1. Claims for Which a Proof of Claim Need Not be Filed

Notwithstanding the above, holders of the following Claims are not required to file a Proof of Claim on or before the applicable Bar Date solely with respect to such claim:

- a) any person or entity that already has filed a Proof of Claim against the Debtor with the Debtor’s claims agent, Donlin, Recano & Company, Inc. (“Donlin Recano”) or the Clerk of the Court in a form substantially similar to Official Bankruptcy Form B 410;
- b) any person or entity whose claim is listed on the Debtor’s Schedules or any amendments thereto unless (i) the claim is scheduled as “disputed,” “contingent,” or

“unliquidated,” or (ii) the claimant disagrees with the amount, nature, and/or priority of the claim as set forth in the Schedules. In the case of either (i) or (ii), a Proof of Claim must be filed on or before the applicable Bar Date;

- c) professionals retained by the Debtor and the Committee, pursuant to orders of the Court, that assert administrative claims for fees and expenses subject to the Court’s approval pursuant to sections 330, 331, and 503(b) of the Bankruptcy Code;
- d) a claim on account of indemnification, contribution, or reimbursement by an officer, director, or employee of the Debtor who held such position as of the Petition Date; provided, however, that any director, officer, or employee of the Debtor as of the Petition Date that resigns or otherwise leaves the employment of the Debtor following the Petition Date must file a proof of claim by the later of (i) the General Bar Date or (ii) thirty (30) days following such resignation or termination of employment if such director, officer, or employee of the Debtor asserts a claim against the Debtor for indemnification, contribution, or for reimbursement related to the foregoing;
- e) a holder of a claim that has previously been allowed by order of the Court;
- f) a holder of a claim that has been paid in full by the Debtor or any other party, including but not limited to claims authorized to be paid pursuant to the Critical Vendor Order or Insurance Order;
- g) Any unpaid Pre-2023 Drivers’ Liability Claims but only to the extent such claims have by the Bar Date been paid by Insurers providing coverage for Pre-2023 Drivers’ Liability Claims; and
- h) any present or former employee of the Debtor, solely with respect to any claim based on the payment of an obligation arising in the ordinary course of business as a wage, commission, or benefit and previously authorized to be paid by any orders granting the *Debtor’s Motion for Entry of Interim and Final Orders Authorizing Debtor to (I) Pay Prepetition Wages, Employee Expenses, and Other Compensation, (II) Maintain Employee Benefit Programs, and (III) Granting Related Relief* [Docket No. 10;].

Please take notice that any claimant exempted from filing a Proof of Claim for a claim as described in the list above must still properly and timely file a Proof of Claim for any other claim that does not fall within the exemptions described in the list above.

ii. Payment Requests

Except as otherwise provided herein, each person or entity (including, without limitation, individuals, partnerships, corporations, joint ventures, trusts, and governmental units) that holds or wishes to assert an alleged Administrative Expense Claim against the Debtor’s estate that may have arisen during the period **from the Petition Date through and including July 17, 2023 MUST FILE A PAYMENT REQUEST ON OR BEFORE THE ADMINISTRATIVE CLAIM BAR DATE** in order to potentially share in the Debtor’s estate.

1. Claims for Which a Payment Request Need Not be Filed

Pursuant to the terms of the Bar Date Order, the Administrative Claim Bar Date does not apply to the following claims:

- a) Administrative Expense Claims that (i) have been previously paid by the Debtor in the ordinary course of the Debtor's business or (ii) have otherwise been allowed by order of the Court;
- b) Administrative Expense Claims previously filed with Donlin Recano or the Court;
- c) Administrative Expense Claims held by a person or entity that filed a motion requesting allowance of such Administrative Expense Claim prior to the date of the Hearing;
- d) Administrative Expense Claims of any professional retained and employed by the Debtor pursuant to sections 327, 328, or 1103 of the Bankruptcy Code, including any ordinary course of business professionals retained, pursuant to an order of this Court approving the employment of ordinary course business professionals, for compensation, indemnification, or reimbursement of costs and expenses relating to professional services performed and expenses incurred on and after the Petition Date;
- e) claims for fees payable to the Clerk of this Court;
- f) fees payable to the Office of the United States Trustee under 28 U.S.C. § 1930(a)(6) or accrued interest thereon arising under 31 U.S.C. § 3717; and
- g) Administrative Expense Claims arising after July 17, 2023.

A CLAIMANT OR REPRESENTATIVE OF THE CLAIMANT SHOULD CONSULT HIS OR HER ATTORNEY IF THE CLAIMANT HAS ANY QUESTIONS, INCLUDING WHETHER SUCH CLAIMANT SHOULD FILE A PAYMENT REQUEST. NEITHER THE DEBTOR'S ATTORNEYS, NOR DONLIN RECANO, NOR THE CLERK OF THE COURT CAN ADVISE THE CLAIMANT WHETHER THE CLAIMANT SHOULD FILE A PAYMENT REQUEST.

iii. Claims Arising from Rejected Executory Contracts or Unexpired Leases

Any person or entity that holds a Claim that arises from the rejection of an executory contract or unexpired lease must file a Proof of Claim based on such rejection by the later of (a) the General Bar Date and (b) thirty (30) days after the effective date of such rejection established in a Court order authorizing such rejection (the "Rejection Bar Date").

iv. Equity Holders

Any person or entity holding an equity security or other ownership interest in the Debtor (an "Interest Holder") is not required to file a proof of interest with respect to the ownership of such equity interest; provided, however, that any Interest Holder that wishes to assert a claim against the Debtor, including a claim that arises out of or relates to the ownership or purchase of an equity

security or other ownership interests, including, but not limited to, a claim for damages, rescission based on the purchase or sale of such equity security or other ownership interests, must file a proof of claim on or prior to the General Bar Date, or the Governmental Bar Date, as applicable to such claim, pursuant to procedures set forth herein. The Debtor's rights are reserved to seek relief at a later date establishing a deadline for Interest Holders to file proofs of interest.

v. Schedules and Amendments thereto

You may be listed as the holder of a Claim in the Schedules. The Schedules are available free of charge on Donlin Recano's website at <https://donlinrecano.com/hyrecar>. If you rely on the Schedules, it is your responsibility to determine that your Claim is accurately listed in the Schedules. As described above, if (a) you agree with the nature, amount and status of your Claim as listed in the Schedules, (b) your Claim is NOT described as "disputed," "contingent," or "unliquidated," and (c) you do not dispute that the claim is an obligation of the particular Debtor against which the claim is listed in the Schedules, then you are not required to file a Proof of Claim in this Chapter 11 Case with respect to such Claim. Otherwise, or if you decide to file a Proof of Claim, you must do so before the applicable Bar Date in accordance with the procedures set forth in this Notice and the Bar Date Order.

If the Debtor amend its Schedules, then the Bar Date for those creditors affected by any such amendment shall be the later of (a) the General Bar Date or the Governmental Bar Date, as applicable, to such claims, or (b) 5:00 p.m. (Prevailing Eastern Time) on the date that is twenty-one (21) days from the date that the Debtor provided written notice to the affected creditor that the Schedules have been amended (the "Amended Schedules Bar Date" and, together with the General Bar Date, Governmental Bar Date, and Rejection Bar Date, the "Bar Dates," and each a "Bar Date").

B. WHEN AND WHERE TO FILE PROOFS OF CLAIM AND PAYMENT REQUESTS

All claimants must submit (by overnight mail, courier service, hand delivery, regular mail or in person) an original, written: (i) Proof of Claim that substantially conforms to the Official Bankruptcy Form No. B 410 or the enclosed Proof of Claim Form; and/or (ii) the Payment Request Form, as applicable, so as to be **actually received** by Donlin Recano by no later than 5:00 p.m. (prevailing Eastern Time) on or before the applicable Bar Date at the following address:

(by first-class mail)
Donlin, Recano & Company, Inc.
Re: HyreCar, Inc.
P.O. Box 199043
Blythebourne Station
Brooklyn, NY 11219

(by overnight mail or hand delivery)
Donlin, Recano & Company, Inc.
Re: HyreCar, Inc.
6201 15th Avenue
Brooklyn, NY 11219

Alternatively, claimants may submit a Proof of Claim or Payment Request, as applicable, electronically through the electronic Claims filing system available at <https://donlinrecano.com/Clients/hci/FileClaim>.

Proofs of Claim and Payment Requests will be deemed timely filed only if actually received by Donlin Recano on or before the applicable Bar Date. Proofs of Claim and Payment Requests may not be delivered by facsimile, telecopy, or electronic mail transmission. Any facsimile, telecopy, or electronic mail submissions will **not** be accepted and will **not** be deemed filed until a Proof of Claim or Payment Request, as applicable, is submitted to Donlin Recano by overnight mail, courier service, hand delivery, regular mail or in person or through the electronic filing system described above. Claimants wishing to receive acknowledgment that their original, written Proofs of Claim or Payment Requests, as applicable, were received by Donlin Recano must submit (i) a copy of the Proof of Claim or Payment Request, as applicable, and (ii) a self-addressed, stamped envelope (in addition to the original Proof of Claim or Payment Request, as applicable, sent to Donlin Recano).

C. CONTENTS OF A PROOF OF CLAIM AND PAYMENT REQUEST

i. Proofs of Claim

As noted above, the Debtor is enclosing a Proof of Claim Form for use in this Chapter 11 Case, or you may use another Proof of Claim form that substantially conforms to Official Bankruptcy Form No. B 410. The Proof of Claim Form is available free of charge on Donlin Recano's website at <https://donlinrecano.com/Clients/hci/FileClaim>.

If your Claim listed in the Debtor's Schedules, the Proof of Claim Form sent to you will indicate how the Debtor has scheduled your Claim in the Schedules, including (a) the amount of the scheduled Claim, if any; (b) whether the Claim is listed as disputed, contingent, or unliquidated; and (c) whether the Claim is listed as a secured, unsecured priority, or unsecured non-priority Claim.

To be valid, your Proof of Claim **MUST**: (a) be signed by the claimant (which, if submitted electronically, may be satisfied by electronic signature through the electronic Claims filing system described above); (b) be written in the English language; (c) be denominated in lawful currency of the United States; provided that Claims in foreign currency must state the amounts claimed in such foreign currency and must also convert each such amount to United States dollars as of the Petition Date; (d) conform substantially to the enclosed Proof of Claim Form or Official Form B 410; (e) set forth with specificity the legal and factual basis for the alleged Claim; and (f) include supporting documentation or an explanation as to why such documentation is not available. **You should redact any sensitive information from your supporting documentation prior to filing your Proof of Claim.**

If you are filing a Claim under section 503(b)(9) of the Bankruptcy Code, you must indicate in Box 13 of the Proof of Claim Form the amount of the Claim that arises under section 503(b)(9) of the Bankruptcy Code. For each Claim under section 503(b)(9) of the Bankruptcy Code, you must attach all documents supporting such Claim to the Proof of Claim Form and include a statement setting forth with specificity: (a) the value of the goods the claimant contends the Debtor received within twenty (20) days before the Petition Date; (b) documentation, including invoices, receipts, purchase orders, bills of lading, and the like, identifying the particular goods for which the claim is being asserted; and (c) a statement indicating (i) whether the value of such goods listed in the Proof of Claim Form represents a

combination of services and goods, (ii) the percentage of value related to services and related to goods, and (iii) whether the claimant has been paid on account of any other claim against the Debtor regarding the goods underlying its Proof of Claim Form.

ii. Payment Requests

As noted above, the Debtor is enclosing a Payment Request Form for use in this Chapter 11 Case. The Payment Request Form is available free of charge on Donlin Recano's website at <https://donlinrecano.com/Clients/hci/FileClaim>.

Each Payment Request must: (i) be signed by the claimant or, if the claimant is not an individual, by an authorized agent of the claimant; (ii) be written English; (iii) denominate the claim in lawful currency of the United States as of the Administrative Claim Bar Date; and (iv) include supporting documentation (or, if such documentation is voluminous, include a summary of such documentation) or an explanation as to why such documentation is not available. Documentation should include both evidence of the nature of the Administrative Expense Claim asserted as well as evidence of the date on which the Administrative Expense Claim arose.

D. CONTINGENT CLAIMS

Acts or omissions of or by the Debtor that occurred, or that are deemed to have occurred, prior to the Petition Date, including, without limitation, acts or omissions related to any indemnity agreement, guarantee, services provided to or rendered by the Debtor, or goods provided to or by the Debtor, may give rise to Claims against the Debtor and its estate notwithstanding the fact that such Claims (or any injuries on which they may be based) may be contingent or may not have matured or become fixed or liquidated prior to the Petition Date. Therefore, any person or entity that holds a Claim or potential Claim against the Debtor and its estate, no matter how remote, contingent, or unliquidated, **MUST** file a Proof of Claim on or before the applicable Bar Date.

E. NO EFFECT ON INSURANCE

The Debtor offered certain insurance coverage for its customers, including, (i) automobile liability and third-party property damage provided to drivers (the "Drivers' Liability Program") and (ii) vehicle damage coverage provided to car owners (the "Physical Damage Program," and with the coverage provided under the Drivers' Liability Program, the "Rental Coverage"). The insurance policies within the Drivers' Liability Program provide liability coverage that satisfies various state law minimum coverage requirements subject to a \$15,000 self-insured retention (the "Drivers' Liability \$15k SIR"). The insurance carriers that provide coverage under the Drivers' Liability Program (the "Insurers") are as follows:

- I. For the coverage for the period ending December 31, 2022 for states other than California, Voyager Indemnity Insurance Company policy number FAR3381004, and Reliable Lloyds Insurance Company policy number FAR3381010;

- II. For coverage commencing January 1, 2023 until the Closing Date (as hereinafter defined), for states other than California, Mobilitas Insurance Company and Mobilitas Insurance Company of Arizona policy numbers TXBA0C4973227794 and AZBA0C4973227792;
- III. Pacific Insurance Company Limited policy number 57YR2OH8220, for coverage for all periods for California; and
- IV. The Physical Damage Program provided coverage to car owners for physical damage to their vehicles pursuant to a policy issued from the Debtor's wholly-owned subsidiary HFIS Insurance Company ("HFIS"), which is licensed as a protected cell captive insurance company.

As provided in the Bar Date Order, the filing of a Proof of Claim or Payment Request shall not impact, implicate or affect any rights or obligations a claimant may have against any insurance policy or insurance carrier that may provide coverage for any Claim(s) asserted in this Chapter 11 Case, whether or not any such insurance policy was offered to claimant through the Debtor's car-sharing platform. Nothing in the Bar Date Order or this Notice shall be construed as having any effect whatsoever on the rights and obligations of any claimant, insurer or any other non-debtor third party with respect to insurance claims filed that may related to Claim(s) filed in this Chapter 11 Case. It is the sole responsibility of claimant to timely file a claim against any insurance policy that may be applicable to a Claim filed against the Debtor, and to pursue any such claim to resolution within the requirements of any such policy. In addition, it is the sole responsibility of the claimant to file a Proof of Claim in this Chapter 11 Case except to the extent such Claim has by the Bar Date been paid by Insurers providing coverage for such Claim. Further information about the Debtor's insurance programs may be found in the Debtor's Insurance Motion [Docket No. 80] and the Debtor's Bar Date Motion [Docket No. 360] online at <https://www.donlinrecano.com/Clients/hci/Index>

**CONSEQUENCES FOR FAILURE TO FILE A
PROOF OF CLAIM AND/OR PAYMENT REQUEST**

Any claimant that is required to file a Proof of Claim and in this Chapter 11 Case pursuant to the Bankruptcy Code, the Bankruptcy Rules or the Bar Date Order with respect to a particular Claim, but that fails to do so properly by the applicable Bar Date, shall be forever barred, estopped, and enjoined from: (a) asserting such Claim against the Debtor and its estate (or filing a Proof of Claim), and the Debtor and its properties and estate shall be forever discharged from any and all indebtedness or liability with respect to such Claim and (b) voting upon, or receiving distributions under, any chapter 11 plan in this Chapter 11 Case or otherwise in respect of or on account of such Claim, and such person or entity shall not be treated as a creditor with respect to such Claim for any purpose in this Chapter 11 Case.

Additionally, any party purportedly holding an Administrative Expense Claim against the Debtor that arose **between the Petition Date and July 17, 2023** that is required to file a Payment Request, but fails to do so properly or timely in accordance with the Bar Date Order, shall not, absent further order of the Court, participate in any distribution in this Chapter 11 Case on account of such

Administrative Expense Claim or, in the event that the Chapter 11 Case is converted, in any case under Chapter 7 of the Bankruptcy Code.

RESERVATION OF RIGHTS

Nothing contained in this Notice or the Bar Date Order is intended or should be construed as a waiver of any of the Debtor's rights, including without limitation, its rights to: (a) dispute, or assert offsets or defenses against, any filed Claim or any Claim listed or reflected in the Schedules as to the nature, amount, liability or classification thereof; (b) subsequently designate any scheduled Claim as disputed, contingent or unliquidated; or (c) otherwise amend or supplement the Schedules. In addition, nothing contained herein is intended or should be construed as an admission of the validity of any Claim or an approval, assumption or rejection of any agreement, contract or lease under section 365 of the Bankruptcy Code. All such rights and remedies are reserved.

ADDITIONAL INFORMATION

The Proof of Claim Form, the Payment Request Form, the Bar Date Order, and all other pleadings filed in these Chapter 11 Cases are available free of charge on Donlin Recano's website at <https://donlinrecano.com/hyrecar>. If you have questions concerning the filing or processing of Claims, you may contact the Debtor's claims and noticing agent, Donlin Recano, by e-mail at hyrecarinfo@drc.equiniti.com or by telephone at +1 (888) 396-0853 for U.S. parties, or +1 (212) 771-1128 for Non-U.S. parties.

Donlin Recano cannot advise you how to file, or whether you should file, a proof of claim. You may wish to consult an attorney regarding this matter.

EXHIBIT 2

Fill in this information to identify the case:

Debtor name: HC Liquidating, Inc. (formerly known as HyreCar, Inc.)

United States Bankruptcy Court for the District of Delaware

Case number: 23-10259 (TMH)

Proof of Claim

Your claim is scheduled by the Debtor as:

Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense other than a claim arising under section 503(b)(9). All requests for payment of administrative expense claims (other than those arising under section 503(b)(9)), should be made using the Administrative Expense Payment Request Form.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents**; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor? Name and address of creditor (the person or entity to be paid for this claim):

Name and address of the creditor.

Other names the creditor used with the debtor: _____

2. Has this claim been acquired from someone else?

☐ No

☐ Yes.

From whom? _____

3. Where should notices and payments to the creditor be sent?

Where should notices to the creditor be sent?

Where should payments to the creditor be sent? (if different)

Federal Rule of Bankruptcy Procedure (FRBP) 2002(g).

Name: _____

Name: _____

Address: _____

Address: _____

City: _____ State: ____ Zip: _____

City: _____ State: ____ Zip: _____

Phone: _____

Phone: _____

Email: _____

Email: _____

Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____

4. Does this claim amend one already filed?

☐ No

☐ Yes. Claim number on court claims registry (if known): _____

Filed on (MM/DD/YYYY): _____

5. Do you know if anyone else has filed a proof of claim for this claim?

☐ No

☐ Yes.

Who made the earlier filing? _____

Part 2: Give Information About the Claim as of the Date the Case was Filed

6. Do you have any number you use to identify the debtor?

☐ No

☐ Yes. Last 4 digits of the debtor's account or any identification number used: _____

7. How much is the claim?

\$ _____

Does this amount include interest or other charges?

☐ No

☐ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim?

Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information. _____

9. Is all or part of the claim secured?	<input type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property.	Nature of property: <input type="checkbox"/> Real estate. If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> .	<input type="checkbox"/> Motor vehicle <input type="checkbox"/> Other (describe): _____
Basis for perfection: _____ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)			
Value of property: \$ _____		Amount of the claim that is secured: \$ _____	
Amount of the claim that is unsecured (the sum of the secured and unsecured amounts should match the amount in line 7): \$ _____			
Amount necessary to cure any default as of the date of the petition: \$ _____		Annual interest rate (when case was filed): _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable	

10. Is this claim based on a lease?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$ _____
--	---

11. Is this claim subject to a right of setoff?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____
--	---

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)? A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority. <small>* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.</small>	<input type="checkbox"/> No <input type="checkbox"/> Yes. <i>Check all that apply:</i> <input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). <input type="checkbox"/> Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). <input type="checkbox"/> Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). <input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). <input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). <input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.	Amount entitled to priority \$ _____ \$ _____ \$ _____ \$ _____ \$ _____ \$ _____
--	---	--

13. Is all or part of the claim entitled to priority under 11 U.S.C. § 503(b)(9)?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach all documents supporting such Claim and include a statement setting forth with specificity: (a) the value of the goods the claimant contends the Debtor received within twenty (20) days before the Petition Date; (b) documentation, including invoices, receipts, purchase orders, bills of lading, and the like, identifying the particular goods for which the claim is being asserted; and (c) a statement indicating (i) whether the value of such goods listed in the Proof of Claim Form represents a combination of services and goods, (ii) the percentage of value related to services and related to goods, and (iii) whether the claimant has been paid on account of any other claim against the Debtor regarding the goods underlying its Proof of Claim Form. \$ _____
--	--

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☐ I am the creditor.
☐ I am the creditor's attorney or authorized agent.
☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

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

Executed on date (MM/DD/YYYY): _____

Signature: _____

Print the name of the person who is completing and signing this claim:

First name: _____ Middle: _____ Last: _____

Title: _____

Company (identify the corporate servicer as the company if the authorized agent is a servicer): _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Email: _____

Instructions for Proof of Claim

United States Bankruptcy Court

12/15

These instructions and definitions generally explain the law. In certain circumstances, such as bankruptcy cases that debtors do not file voluntarily, exceptions to these general rules may apply. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the bankruptcy process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.
18 U.S.C. §§ 152, 157 and 3571.

How to fill out this form

- Fill in all of the information about the claim as of the date the case was filed.
- If the claim has been acquired from someone else, then state the identity of the last party who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
- Attach any supporting documents to this form.
Attach redacted copies of any documents that show that the debt exists, a lien secures the debt, or both. (See the definition of *redaction* on the reverse page.)

Also attach redacted copies of any documents that show perfection of any security interest or any assignments or transfers of the debt. In addition to the documents, a summary may be added. Federal Rule of Bankruptcy Procedure (called “Bankruptcy Rule”) 3001(c) and (d).
- Do not attach original documents because attachments may be destroyed after scanning.
- If the claim is based on delivering health care goods or services, do not disclose confidential health care information. Leave out or redact confidential information both in the claim and in the attached documents.

- A **Proof of Claim** form and any attached documents must show only the last 4 digits of any social security number, individual’s tax identification number, or financial account number, and only the year of any person’s date of birth. See Bankruptcy Rule 9037.
- For a minor child, fill in only the child’s initials and the full name and address of the child’s parent or guardian. For example, write *A.B., a minor child (John Doe, parent, 123 Main St., City, State)*. See Bankruptcy Rule 9037.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, either enclose a stamped self-addressed envelope and a copy of this form or you may access the claims agent’s website (www.donlinrecano.com/hyrecar) to view the filed form.

Understand the terms used in this form

Administrative expense: Generally, an expense that arises after a bankruptcy case is filed in connection with operating, liquidating, or distributing the bankruptcy estate.
11 U.S.C. § 503.

Administrative expense claim under 11 U.S.C. §503(b)(9): Administrative expense claims under 11 U.S.C. §503(b)(9) include those claims for the value of any goods received by the debtor, within 20 days before the date of commencement of a case under the Bankruptcy Code in which the goods have been sold to the debtor in the ordinary course of such debtor’s business.

Claim: A creditor’s right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Creditor: A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. §101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. Use the debtor's name and case number as shown in the bankruptcy notice you received. 11 U.S.C. § 101 (13).

Evidence of perfection: Evidence of perfection of a security interest may include documents showing that a security interest has been filed or recorded, such as a mortgage, lien, certificate of title, or financing statement.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Priority claim: A claim within a category of unsecured claims that is entitled to priority under 11 U.S.C. §507(a). These claims are paid from the available money or property in a bankruptcy case before other unsecured claims are paid. Common priority unsecured claims include alimony, child support, taxes, and certain unpaid wages.

Proof of claim: A form that shows the amount of debt the debtor owed to a creditor on the date of the bankruptcy filing. The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Secured claim under 11 U.S.C. §506(a): A claim backed by a lien on particular property of the debtor. A claim is secured to the extent that a creditor has the right to be paid from the property before other creditors are paid. The amount of a secured claim usually cannot be more than the value of the particular property on which the creditor has a lien. Any amount owed to a creditor that is more than the value of the property normally may be an unsecured claim. But exceptions exist; for example, see 11 U.S.C. § 1322(b) and the final sentence of 1325(a).

Examples of liens on property include a mortgage on real estate or a security interest in a car. A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In some states, a court judgment may be a lien.

Setoff: Occurs when a creditor pays itself with money belonging to the debtor that it is holding, or by canceling a debt it owes to the debtor.

Uniform claim identifier: An optional 24-character identifier that some creditors use to facilitate electronic payment.

Unsecured claim: A claim that does not meet the requirements of a secured claim. A claim may be unsecured in part to the extent that the amount of the claim is more than the value of the property on which a creditor has a lien.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

PLEASE SEND COMPLETED PROOF(S) OF CLAIM TO:

If Proof of Claim is sent by mail, send to:

Donlin, Recano & Company, Inc.
Re: HyreCar, Inc.
P.O. Box 199043
Blythebourne Station
Brooklyn, NY 11219

If Proof of Claim is sent by Overnight Courier or Hand Delivery, send to:

Donlin, Recano & Company, Inc.
Re: HyreCar, Inc.
6201 15th Avenue
Brooklyn, NY 11219

Alternatively, your proof of claim may be filed electronically on DRC's website at:

<https://www.donlinrecano.com/Clients/hci/FileClaim>

Do not file these instructions with your form.

EXHIBIT 3

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

In re:

HC LIQUIDATING, INC.,

Debtor.¹

Chapter 11

Case No. 23-10259 (TMH)

ADMINISTRATIVE EXPENSE PAYMENT REQUEST FORM

**THIS FORM IS TO BE USED ONLY FOR CERTAIN ADMINISTRATIVE EXPENSE
CLAIMS INVOLVING THE DEBTOR AND OCCURRING BETWEEN
FEBRUARY 24, 2023 AND JULY 17, 2023**

**FOR CLAIMS ARISING BEFORE FEBRUARY 24, 2023 (AND FOR SECTION 503(B)(9)
CLAIMS), USE THE GENERAL PROOF OF CLAIM FORM**

1. **Name of claimant:** _____

2. **Name of Debtor claim asserted against:**

HC Liquidating, Inc. (formerly known as HyreCar, Inc.)

3. **Nature and description of the claim (you may attach a separate summary):**

4. **Date(s) claim arose:** _____

5. **Amount of claim: \$** _____

6. **Documentation supporting the claim must be attached hereto.** Documentation should include both evidence of the nature of the administrative expense claim asserted as well as evidence of the date or dates on which the administrative expense claim arose.

[see reverse page for signature]

¹ The last four digits of the Debtor's federal tax identification numbers are 0487. The Debtor's mailing address is 1001 Wilshire Boulevard PMB 2196, Los Angeles, CA 90017.

SIGN BELOW:

The person completing this payment request must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☐ I am the creditor.
☐ I am the creditor's attorney or authorized agent.
☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Payment Request* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Payment Request* and have a reasonable belief that the information is true and correct.

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

Executed on date (MM/DD/YYYY): _____

Signature: _____

Print the name of the person who is completing and signing this claim:

First name: _____ Middle: _____ Last: _____

Title: _____

Company (identify the corporate servicer as the company if the authorized agent is a servicer): _____

Address: _____

City: _____ State: _____ Zip: _____

Phone: _____ Email: _____

EXHIBIT 4

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

In re:

HC LIQUIDATING, INC.,

Debtor.¹

Chapter 11

Case No. 23-10259 (TMH)

**NOTICE OF DEADLINES FOR THE FILING OF PROOFS OF CLAIM
AND REQUESTS FOR ALLOWANCE OF ADMINISTRATIVE CLAIMS**

PLEASE TAKE NOTICE OF THE FOLLOWING:

**GENERAL BAR DATE: [], 2023 AT 5:00 P.M. (ET)
ADMINISTRATIVE CLAIM BAR DATE: [], 2023 AT 5:00 P.M. (ET)
GOVERNMENTAL BAR DATE: AUGUST 23, 2023 AT 5:00 P.M. (ET)**

On February 24, 2023 (the “Petition Date”), the above-captioned debtor (the “Debtor”), formerly known as HyreCar, Inc., filed a voluntary petition for relief under chapter 11 of title 11 of the U.S. Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”). The Debtor’s chapter 11 case is administered under case number 23-10259 (TMH) (the “Chapter 11 Case”).

On [], 2023, the United States Bankruptcy Court for the District of Delaware (the “Court”) entered an order [Docket No.] (the “Bar Date Order”)² establishing certain deadlines for the filing of Proofs of Claim and Payment Requests in this Chapter 11 Case.

Pursuant to the Bar Date Order, each person or entity (including, without limitation, each individual, partnership, joint venture, corporation, estate, and trust) that holds or seeks to assert a Claim (as defined in section 101(5) of the Bankruptcy Code) against the Debtor that arose, or is deemed to have arisen, prior to the Petition Date (including, without limitation, Claims entitled to administrative priority status under section 503(b)(9) of the Bankruptcy Code), no matter how remote or contingent such right to payment or equitable remedy may be (with certain limited exceptions as set forth in the Bar Date Order), **MUST FILE A PROOF OF CLAIM** on or before [] **at 5:00 p.m. (prevailing Eastern Time)** (the “General Bar Date”), by sending an original Proof of Claim form to: (if by mail) Donlin, Recano & Company, Inc., Re: HyreCar, Inc., P.O. Box 199043, Blythebourne Station, Brooklyn, NY 11219; (if by overnight mail or hand delivery) Donlin, Recano & Company, Inc., Re: HyreCar, Inc., 6201 15th Avenue, Brooklyn, NY 11219; or by completing the online Proof of Claim form available at <https://donlinrecano.com/hyrecar>, so that it is **actually received** on or before the General Bar Date; provided that, solely with respect to governmental units (as defined in section 101(27) of the

¹ The last four digits of the Debtor’s federal tax identification numbers are 0487. The Debtor’s mailing address is 1001 Wilshire Boulevard PMB 2196, Los Angeles, CA 90017.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Bar Date Order.

Bankruptcy Code), the deadline for such governmental units to file a Proof of Claim is **August 23, 2023 at 5:00 p.m. (prevailing Eastern Time)** (the “Governmental Bar Date”).

Each person or entity (including, without limitation, individuals, partnerships, corporations, joint ventures, trusts, and governmental units) that holds or wishes to assert an alleged Administrative Expense Claim against the Debtor’s estate that may have arisen **during the period from the Petition Date through and including July 17, 2023 MUST FILE A PAYMENT REQUEST** on or before [] **at 5:00 p.m. (prevailing Eastern Time)** (the “Administrative Claim Bar Date”) by sending an original Payment Request form to: (if by mail) Donlin, Recano & Company, Inc., Re: HyreCar, Inc., P.O. Box 199043, Blythebourne Station, Brooklyn, NY 11219; (if by overnight mail or hand delivery) Donlin, Recano & Company, Inc., Re: HyreCar, Inc., 6201 15th Avenue, Brooklyn, NY 11219; or by completing the online Payment Request form available at <https://donlinrecano.com/hyrecar>, so that it is actually received on or before the Administrative Claim Bar Date.

Any person or entity that holds a Claim that arises from the rejection of an executory contract or unexpired lease must file a Proof of Claim based on such rejection by the later of (a) the General Bar Date and (b) thirty (30) days after the effective date of such rejection established in a Court order authorizing such rejection (the “Rejection Bar Date”).

You may be listed as the holder of a Claim in the Schedules. The Schedules are available free of charge on Donlin Recano’s website at <https://donlinrecano.com/hyrecar>. If you rely on the Schedules, it is your responsibility to determine that your Claim is accurately listed in the Schedules. As described above, if (a) you agree with the nature, amount and status of your Claim as listed in the Schedules, (b) your Claim is NOT described as “disputed,” “contingent,” or “unliquidated,” and (c) you do not dispute that the claim is an obligation of the particular Debtor against which the claim is listed in the Schedules, then you are not required to file a Proof of Claim in this Chapter 11 Case with respect to such Claim. Otherwise, or if you decide to file a Proof of Claim, you must do so before the applicable Bar Date in accordance with the procedures set forth in this Notice and the Bar Date Order.

If the Debtor amends its Schedules, then the Bar Date for those creditors affected by any such amendment shall be the later of (a) the General Bar Date or (b) 5:00 p.m. (Prevailing Eastern Time) on the date that is twenty-one (21) days from the date that the Debtor provided written notice to the affected creditor that the Schedules have been amended (the “Amended Schedules Bar Date” and, together with the General Bar Date, Governmental Bar Date, and Rejection Bar Date, the “Bar Dates,” and each a “Bar Date”).

Proofs of Claim and Payment Requests must be sent by overnight mail, courier service, hand delivery, regular mail or in person, or completed electronically through Donlin Recano’s website described above. Proofs of Claim and Payment Requests sent by facsimile, telecopy, or electronic mail will **not** be accepted and will **not** be considered properly or timely filed for any purpose in this Chapter 11 Case. There are certain limited exemptions from the requirements to file a Proof of Claim and Payment Requests, which are described in the Bar Date Order.

THE FACT THAT THE DEBTOR HAS PUBLISHED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM AGAINST THE DEBTOR OR THAT THE DEBTOR BELIEVES THAT YOU HAVE A CLAIM AGAINST THE DEBTOR.

ANY PERSON OR ENTITY THAT IS REQUIRED TO FILE A PROOF OF CLAIM AND/OR PAYMENT REQUEST, AS APPLICABLE, IN THIS CHAPTER 11 CASE WITH RESPECT TO A PARTICULAR CLAIM AGAINST THE DEBTOR BUT FAILS TO DO SO PROPERLY BY THE APPLICABLE BAR DATE, SHALL BE FOREVER BARRED, ESTOPPED AND ENJOINED FROM: (A) ASSERTING SUCH CLAIM AGAINST THE DEBTOR AND ITS ESTATE (OR FILING A PROOF OF CLAIM OR PAYMENT REQUEST), AND THE DEBTOR AND ITS PROPERTIES AND ESTATE SHALL BE FOREVER DISCHARGED FROM ANY AND ALL INDEBTEDNESS OR LIABILITY WITH RESPECT TO SUCH CLAIM; AND (B) VOTING UPON, OR RECEIVING DISTRIBUTIONS UNDER, ANY CHAPTER 11 PLAN IN THIS CHAPTER 11 CASE OR OTHERWISE IN RESPECT OF OR ON ACCOUNT OF SUCH CLAIM, AND SUCH PERSON OR ENTITY SHALL NOT BE TREATED AS A CREDITOR WITH RESPECT TO SUCH CLAIM FOR ANY PURPOSE IN THIS CHAPTER 11 CASE.

THE FILING OF A PROOF OF CLAIM OR PAYMENT REQUEST SHALL NOT IMPACT, IMPLICATE OR AFFECT ANY RIGHTS OR OBLIGATIONS A CLAIMANT MAY HAVE AGAINST ANY INSURANCE POLICY OR INSURANCE CARRIER THAT MAY PROVIDE COVERAGE FOR ANY CLAIM(S) ASSERTED IN THIS CHAPTER 11 CASE, WHETHER OR NOT ANY SUCH INSURANCE POLICY WAS OFFERED TO CLAIMANT THROUGH THE DEBTOR'S CAR-SHARING PLATFORM. THIS NOTICE SHALL BE CONSTRUED AS HAVING ANY EFFECT WHATSOEVER ON THE RIGHTS AND OBLIGATIONS OF ANY CLAIMANT, INSURER OR ANY OTHER NON-DEBTOR THIRD PARTY WITH RESPECT TO INSURANCE CLAIMS FILED THAT MAY RELATED TO CLAIM(S) FILED IN THIS CHAPTER 11 CASE. IT IS THE SOLE RESPONSIBILITY OF CLAIMANT TO TIMELY FILE A CLAIM AGAINST ANY INSURANCE POLICY THAT MAY BE APPLICABLE TO A CLAIM FILED AGAINST THE DEBTOR, AND TO PURSUE ANY SUCH CLAIM TO RESOLUTION WITHIN THE REQUIREMENTS OF ANY SUCH POLICY.

The Proof of Claim Form, the Payment Request Form, the Bar Date Order, and all other pleadings filed in this Chapter 11 Case are available free of charge on Donlin Recano's website at <https://donlinrecano.com/hyrecar>. If you have questions concerning the filing or processing of Claims, you may contact the Debtor's claims and noticing agent, Donlin Recano, by e-mail at hyrecarinfo@drc.equiniti.com or by telephone at +1 (888) 396-0853 for U.S. parties, or +1 (212) 771-1128 for Non-U.S. parties.