

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

In re:

HYRECAR INC.,

Debtor.¹

Chapter 11

Case No. 23-10259 (JTD)

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR FIRST-DAY
HEARING ON FEBRUARY 28, 2023 AT 3:00 P.M. (EASTERN TIME)
BEFORE THE HONORABLE JOHN T. DORSEY**

**THE REMOTE HEARING WILL BE CONDUCTED ENTIRELY BY ZOOM AND
REQUIRES ALL PARTICIPANTS TO REGISTER IN ADVANCE.
COURTCALL WILL NOT BE USED TO DIAL IN.**

PLEASE USE THE FOLLOWING LINK TO REGISTER FOR THE HEARING:

https://debuscourts.zoomgov.com/meeting/register/vJlscO2trDMqHFyIBWeE_P18SRcU1BGXtoQ

**ONCE REGISTERED, PARTIES WILL RECEIVE A CONFIRMATION EMAIL
CONTAINING PERSONAL LOG-IN INFORMATION FOR THE HEARING**

RELATED MATTERS

A. Voluntary Petition

1. HyreCar, Inc., Case No. 23-10259 (JTD) (Filed February 24, 2023) [[Docket No. 1](#)]

B. Declaration of Eduardo Iniguez, Chief Executive Officer of the Debtor HyreCar Inc., in Support of Chapter 11 Petition and First Day Pleadings (Filed February 25, 2023) [[Docket No. 15](#)].

MATTERS GOING FORWARD

C. First-Day Motions

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, California, 90017

1. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing Continued Use of Existing Cash Management System, Accounts, (II) Authorizing Use of Prepetition Business Forms and Payment of Related Prepetition Obligations, and (III) Waiving the Requirements of Section 345(b) on an Interim Basis (Filed February 24, 2023) [[Docket No. 4](#)]

Status: This matter will be going forward.

2. Motion of Debtor for Entry of Order Authorizing Debtor to (I) Redact Certain Personally Identifiable Information for Individual Creditors, (II) Waive the Requirement to File a List of Equity Security Holders and Modify Notice Thereto, and (III) Granting Related Relief (Filed February 24, 2023) [[Docket No. 5](#)]

Status: This matter will be going forward.

3. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing Debtor to Maintain and Administer Its Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto and (II) Granting Related Relief (Filed February 24, 2023) [[Docket No. 6](#)]

Status: This matter will be going forward.

4. Debtor's Application for Authorization to Appoint Donlin, Recano & Company, Inc. as Claims and Noticing Agent Effective as of the Petition Date (Filed February 24, 2023) [[Docket No. 7](#)]

Status: This matter will be going forward.

5. 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 (Filed February 25, 2023) [[Docket No. 10](#)]

Status: This matter will be going forward.

6. [SEALED] Debtor's Motion for Entry of Interim and Final Orders Under 11 U.S.C. §§ 105(a), 363, 503(b)(1)(a), 1107(a), and 1108 and Fed. R. Bankr. P. 6003: (I) Authorizing the Debtor to Pay Certain Prepetition Claims of Critical Vendors and Service Providers; (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers; and (III) Granting Related Relief (Filed February 25, 2023) [[Docket No. 11](#)]

- i. [REDACTED] Debtor's Motion for Entry of Interim and Final Orders Under 11 U.S.C. §§ 105(a), 363, 503(b)(1)(a), 1107(a), and 1108 and Fed. R. Bankr. P. 6003: (I) Authorizing the Debtor to Pay Certain Prepetition Claims of Critical Vendors and Service Providers; (II) Authorizing

Financial Institutions to Honor and Process Related Checks and Transfers;
and (III) Granting Related Relief (Filed February 25, 2023) [[Docket No. 12](#)]

Status: This matter will be going forward.

7. Debtor's Motion for Order Authorizing Debtor to File Under Certain Portions of The Debtor's Motion for Entry of Interim and Final Orders Under 11 U.S.C. §§ 105(a), 363, 503(b)(1)(a), 1107(a), and 1108 and Fed. R. Bankr. P. 6003: (I) Authorizing the Debtor to Pay Certain Prepetition Claims of Critical Vendors and Service Providers; (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers; and (III) Granting Related Relief (Filed February 25, 2023) [[Docket No. 13](#)]

Status: This matter will be going forward.

8. Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to Obtain Postpetition Financing, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Modifying Automatic Stay, and (IV) Granting Related Relief (Filed February 25, 2023) [[Docket No. 14](#)]

Status: This matter will be going forward.

Dated: February 27, 2023
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Andrew J. Roth-Moore

Norman L. Pernick (No. 2290)

Andrew J. Roth-Moore (No. 5988)

500 Delaware Avenue, Suite 1410

Wilmington, DE 19801

Telephone: (302) 652-3131

Facsimile: (302) 652-3117

E-mail: npernick@coleschotz.com

aroth-moore@coleschotz.com

- and -

GREENBERG GLUSKER LLP

Brian L. Davidoff, Esq. (pro hac vice pending)

Keith P. Banner, Esq. (pro hac vice pending)

2049 Century Park East, Suite 2600

Los Angeles, CA 90067

Telephone: (310) 553-3610

Facsimile: (310) 553-0687

E-mail: bdavidoff@greenbergglusker.com

kbanner@greenbergglusker.com

*Proposed Counsel for Debtor and
Debtor-in-Possession*