

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

In re:

HYRECAR INC.,

Debtor.¹

Chapter 11

Case No. 23-10259 (JTD)

Related Docket Nos. 4, 5, 6, 7, 10, 11 & 14

**NOTICE OF BANKRUPTCY FILING AND
FIRST DAY MOTIONS AND RELATED PLEADINGS**

PLEASE TAKE NOTICE that on February 24, 2023, HyreCare, Inc. (the, “Debtor”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”) with the United States Bankruptcy Court for the District of Delaware (the “Court”), as set forth below:

A. Voluntary Petition

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

PLEASE TAKE FURTHER NOTICE that, in addition to the filing of the Petition, the Debtor have filed the following first day motions and related pleadings (the “First Day Motions”):

B. First-Day Motions

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]
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]
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]

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.

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]
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]
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]
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]
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]

PLEASE TAKE FURTHER NOTICE that, copies of the above-referenced First Day Motions may be obtained free of charge (i) by request to the Debtor's proposed counsel via email to lmorton@coleschotz.com; and (ii) at the website of the Debtor's proposed claims and noticing agent, <https://www.donlinrecano.com/Clients/hci/Index>. In addition, copies of the Pleadings also can be downloaded for a fee from the Court's website, www.deb.uscourts.gov. To access documents on the Court's website, you will need a PACER password and login which can be obtained at <http://www.pacer.psc.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE that the Court has scheduled a hearing for consideration of the First Day Motions ("First Day Hearing") for **February 28, 2023 at 3:00 p.m. (Eastern Time)** before the Honorable John T. Dorsey at the United States Bankruptcy Court for

the District of Delaware. The First Day Hearing will be a remote hearing conducted entirely by Zoom. The Debtors will file a Notice of Agenda² with instructions regarding the hearing.

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*

² A copy of the Notice of Agenda will be available through (i) the website of the Debtor's proposed claims and noticing agent, <https://www.donlinrecano.com/Clients/hci/Index> free of charge; or (ii), the Court's website, www.deb.uscourts.gov, for a fee.