

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

In re:

YELLOW CORPORATION, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-11069 (CTG)

(Jointly Administered)

**VERIFIED STATEMENT OF THE AD HOC GROUP
OF EQUITY HOLDERS PURSUANT TO BANKRUPTCY RULE 2019**

In connection with the chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors in possession (the “Debtors”), Paul Hastings LLP (“Paul Hastings”) and Saul Ewing LLP (“Saul Ewing” and together with Paul Hastings, “Counsel”) hereby submits this verified statement (the “Verified Statement”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) in connection with Paul Hastings’ representation of an ad hoc group (the “Ad Hoc Group”) of equity holders. As certified to Counsel by the Ad Hoc Group, each member holds, or are the investment advisors, sub-advisors, or managers for discretionary accounts that hold a certain amount of one or more of the aforementioned existing equity (the “Holdings”).

1. The members of the Ad Hoc Group are either the beneficial holders of, or the investment advisors or managers to, funds and/or accounts that hold disclosable economic interests in relation to the Debtors. Attached hereto as **Exhibit A** is a list of the names and addresses for Ad Hoc Group and the amount of the Holdings as of May 31, 2024 (as certified to Counsel by each member of the Ad Hoc Group). The information contained in **Exhibit A** is based upon information

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

provided by the members of the Ad Hoc Group to Counsel and is subject to change. Each member of the Ad Hoc Group has consented to Counsel's representation.

2. As of the date of this Verified Statement, Counsel represents only the Ad Hoc Group and does not represent or purport to represent any persons or entities other than the Ad Hoc Group in connection with the Chapter 11 Cases. In addition, as of the date of this Verified Statement, the Ad Hoc Group, both collectively and through its individual members, does not represent or purport to represent any other persons or entities in connection with the Chapter 11 Cases.

3. The information contained in this Verified Statement and **Exhibit A** attached hereto is intended only to comply with Bankruptcy Rule 2019 and is not intended for any other purpose. Nothing contained herein should be construed as a limitation or waiver of any rights of any member of the Ad Hoc Group, including, without limitation, the right to assert, file and/or amend its claims in accordance with any applicable orders entered in these Chapter 11 Cases. The information contained in **Exhibit A** is based upon information provided by the applicable members of the Ad Hoc Group. Counsel does not make any representation regarding the validity, amount, allowance, or priority of such claims, and reserves all rights with respect thereto. Counsel does not own, nor have they ever owned, any claims against or interests in the Debtors, except for claims for services rendered to the Ad Hoc Group. The Ad Hoc Group, through Counsel, reserves the right to amend and/or supplement this Verified Statement in accordance with the requirements set forth in Bankruptcy Rule 2019 at any time in the future.

Dated: May 31, 2024
Wilmington, Delaware

SAUL EWING LLP

/s/ Lucian Murley
Lucian Murley, Esq. (DE Bar No. 4892)
1201 North Market Street
Suite 2300
Wilmington, DE 19801
Telephone: (302) 421-6800
Email: luke.murley@saul.com

Jayme T. Goldstein (admission *pro hac vice* pending)
Daniel A. Fliman (admission *pro hac vice* pending)
Gabriel E. Sasson (admission *pro hac vice* pending)

PAUL HASTINGS LLP

200 Park Avenue
New York, New York 10166
Telephone: (212) 318-6000
Facsimile: (212) 319-4090
Email: jaymegoldstein@paulhastings.com
danfliman@paulhastings.com
gabesasson@paulhastings.com

Counsel to the Ad Hoc Group of Equity Holders

Exhibit A

Entity	Address	Nature and Principal Amount of Debt Holdings
Conversant Capital LLC on behalf of its managed funds	25 Deforest Avenue 3rd Floor Summit, NJ 07901	2,999,000 shares of common stock
Carronade Capital Management, LP on behalf of its managed funds	17 Old Kings Highway South Suite 140 Darien, CT 06820	1,677,874 shares of common stock