

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

In re:

Chapter 11

BIRD GLOBAL, INC., *et al.*,¹

Case No.: 23-20514-CLC

Debtors.

(Jointly Administered)

**EX PARTE MOTION TO ALLOW STEVEN M. BERMAN TO APPEAR
REMOTELY AT THE APRIL 3, 2025, HEARING**

The Cities of San Diego, San Jose, Long Beach, Los Angeles, and Santa Monica, California (the “**Cities**”) by and through their undersigned counsel, hereby request entry of an Order, substantially similar to the one attached hereto, authorizing the remote appearance of the undersigned at the hearing scheduled for April 3, 2025, at 10:00 a.m. ET (the “**Hearing**”), and, in support thereof, respectfully state as follows:

1. The Cities file this *ex parte* motion in accordance with this Court’s *Requirements and Procedures for Remote Attendance at Hearings* before Judge Corali Lopez-Castro.
2. This motion is timely brought because this filing is made not later than two business days before the Hearing.

3. The matters currently set to be heard at the Hearing are:

¹ The address of the Debtors is 392 Northeast 191st Street, #20388, Miami, FL 33179. The last four digits of the Debtors’ federal tax identification numbers are: (i) Bird Global, Inc. (3155); (ii) Bird Rides, Inc. (9939); (iii) Bird US Holdco, LLC (8390); (iv) Bird US Opco, LLC (6873); and (v) Skinny Labs, Inc. (8176).

- *Motion for Joinder in Motion of the Liquidating Trustee for Entry of an Order Pursuant to Bankruptcy Code Section 105(A) and Bankruptcy Rule 9006 Extending the Claims Objection Bar Date, and Motion to Extend the Claims Objection Bar Date as to Counterclaims (Re: 1574 Motion to Extend Time)* Filed by Creditors City of Los Angeles, City of Santa Monica (Berman, Steven) (Doc. 1575).
- *Motion to Extend Time to / Motion of the Liquidating Trustee for Entry of an Order Pursuant to Bankruptcy Code Sections 105(A) and Bankruptcy Rule 9006 Extending the Claims Objection Bar Date* Filed by Other Professional Joseph J. Luzinski, of Development Specialists, Inc., not individually but solely in his capacity as Liquidating Trustee for the Liquidating Trust (Elgidely, Robert) (Doc. 1574).

4. The undersigned requests to appear remotely because, on the date for which the Hearing is scheduled, the undersigned is scheduled to be in Tampa, Florida for meetings in unrelated matters. As such, it will not be possible for the undersigned to appear in person for the Hearing in this matter. Good cause exists to allow Steven M. Berman to appear remotely via Zoom at the Hearing.

5. This request is not made for purposes of delay and will not prejudice any party.

WHEREFORE, the Cities of San Diego, San Jose, Long Beach, Los Angeles, and Santa Monica, California, respectfully request that this Court enter an order substantially similar to the proposed order attached hereto as **Exhibit A**, (i) granting this motion; (ii) authorizing the undersigned to remotely appear at and participate in the Hearing scheduled for April 3, 2025, at

10:00 a.m. ET; and (iii) granting any and all further relief as is necessary and just.

Dated: March 24, 2025

Respectfully submitted,

/s/ Steven M. Berman

Steven M. Berman, Esq.

Fla. Bar No. 856290

SHUMAKER, LOOP & KENDRICK, LLP

101 E. Kennedy Blvd., Ste. 2800

Tampa, FL 33602

T: (813) 229-7600 | F: (813) 229-1660

Primary email: sberman@shumaker.com

Secondary email: choffman@shumaker.com

*Counsel for the Cities of San Diego, San Jose,
Long Beach, Los Angeles, and Santa Monica,
California*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on March 24, 2025, a true and correct copy of the foregoing has been served electronically through this Court's CM/ECF system upon all parties registered to receive electronic notice in this case.

/s/ Steven M. Berman

Steven M. Berman, Esq.

Exhibit A

(Proposed form of Order)

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
www.flsb.uscourts.gov

In re:

Chapter 11

BIRD GLOBAL, INC., *et al.*,²

Case No.: 23-20514-CLC

Debtors.

(Jointly Administered)

**ORDER GRANTING *EX PARTE* MOTION TO ALLOW STEVEN M. BERMAN
TO APPEAR REMOTELY AT THE APRIL 3, 2025 HEARING**

This matter, having come before the Court, without a hearing, upon the *Ex Parte Motion to Allow Steven M. Berman to Appear Remotely at the April 3, 2025 Hearing* [Doc. No. ____] (the “**Motion**”), the Court having reviewed the Motion, having found good cause exists for the relief requested in the Motion, and being otherwise fully advised in the premises, it is hereby

² The address of the Debtors is 392 Northeast 191st Street, #20388, Miami, FL 33179. The last four digits of the Debtors’ federal tax identification numbers are: (i) Bird Global, Inc. (3155); (ii) Bird Rides, Inc. (9939); (iii) Bird US Holdco, LLC (8390); (iv) Bird US Opco, LLC (6873); and (v) Skinny Labs, Inc. (8176).

ORDERED as follows:

1. The Motion is **GRANTED** as set forth herein; and
2. Steven M. Berman, Esq., counsel for the Cities of San Diego, San Jose, Long Beach, Los Angeles, and Santa Monica, California is authorized to remotely appear at and participate in the hearing scheduled for April 3, 2025, at 10:00 a.m. ET.

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Submitted by:

Steven M. Berman, Esq.

SHUMAKER, LOOP & KENDRICK, LLP

101 E. Kennedy Blvd., Ste. 2800

Tampa, FL 33602

T: (813) 229-7600 | F: (813) 229-1660

Primary email: sberman@shumaker.com

Secondary email: choffman@shumaker.com

*Counsel for the Cities of San Diego, San Jose,
Long Beach, Los Angeles, and Santa Monica,
California*

(Attorney Steven M. Berman is directed to serve a copy of this order on all non-registered users or registered users who have yet to appear electronically in this case and file a conforming certificate of service).