

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

In re:)	
)	Chapter 11
)	
MARELLI AUTOMOTIVE LIGHTING USA LLC,)	Case No. 25-11034 (____)
<i>et al.</i> , ¹)	
Debtors.)	(Joint Administration Requested)
)	

**DECLARATION OF TONY SIMION,
MANAGING DIRECTOR OF ALVAREZ & MARSAL
NORTH AMERICA, LLC, IN SUPPORT OF FIRST DAY MOTIONS**

I, Tony Simion, hereby declare under penalty of perjury:

1. I am a Managing Director of Alvarez & Marsal North America, LLC (“A&M”), the proposed financial advisor for Marelli Automotive Lighting USA, LLC, a company incorporated under the laws of Delaware (together with its debtor affiliates, collectively, the “Debtors,” and with their non-debtor subsidiaries, “Marelli” or the “Company”).

2. On June 11, 2025 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), with the United States Bankruptcy Court for the District of Delaware (the “Court”).

3. I have been advising the Company in my capacity as restructuring advisor since March 2025. As a result of my role advising the Company, I am generally knowledgeable and familiar with the Company’s day-to-day operations, business and financial affairs, books and records, and the circumstances leading to the commencement of these chapter 11 cases. I have

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://www.veritaglobal.net/Marelli>. The location of Marelli Automotive Lighting USA LLC’s principal place of business and the Debtors’ service address in these chapter 11 cases is 26555 Northwestern Highway, Southfield, Michigan 48033.



overseen (and continue to oversee) the services provided by A&M, as described below. The statements set forth in this Declaration are based on (i) my personal knowledge, (ii) my review of relevant documents, (iii) my discussions with the Debtors' management team, other members of the A&M team, and the Debtors' other advisors, (iv) my review of information concerning the Debtors' operations, financial affairs, and restructuring initiatives, and (v) my views based upon my experience and knowledge. I am above eighteen years of age, and I am competent to testify.

Professional Background and Qualifications

4. I am a Managing Director at A&M and have been engaged as restructuring advisor to the Debtors since March 2025. I have a Master of Business Administration from the Babcock School of Management at Wake Forest University. I am also a Certified Insolvency and Restructuring Advisor and a member of the Association of Insolvency and Restructuring Advisors, the Turnaround Management Association, and the American Bankruptcy Institute. I have more than twenty years of restructuring experience, both as a principal and as an advisor helping clients in restructuring and turnaround situations, preparing business plans and assessments, developing and implementing financing and accounting departments, and managing liquidity and treasury departments. I have also led and implemented a myriad of turnaround and restructuring transactions. Some notable, publicly disclosed restructuring assignments that I have been involved with include *In re Dynata, LLC*, Case No. 24-11057 (TMH) (Bankr. D. Del. 2024); *In re Washington Prime Grp. Inc.*, Case No. 21-31948 (MI) (Bankr. S.D.T.X. 2021); *In re Sable Permian Res., LLC*, Case No. 20-33193 (MI) (Bankr. S.D. Tex. 2020).

5. A&M is a leading restructuring consulting firm with extensive experience providing high quality, specialized management and restructuring advisory services to debtors and distressed companies. Specifically, A&M's core services include turnaround advisory services, interim and crisis management, revenue enhancement, claims management, and creditor and risk

management advisory services. A&M provides a wide range of debtor advisory services targeted at stabilizing and improving a company's financial position, including (i) developing or validating forecasts, business plans, and related assessments of strategic positions; (ii) monitoring and managing cash, cash flow, and supplier relationships; (iii) assessing and recommending cost reduction strategies; and (iv) designing and negotiating financial restructuring packages. In addition, A&M provides advice on specific aspects of the turnaround process and helps manage complex constituency relations and communications. A&M is known for its ability to work alongside company management and key constituents during chapter 11 restructurings to develop a feasible and executable plan of reorganization.

Advisor Retention

6. The Debtors engaged A&M in March 2025 to serve as their restructuring advisor. Over the course of its engagement, A&M has evaluated the Debtors' operations and cash requirements to operate their business, including by assisting in the development of the Debtors' near-term cashflow forecasts and liquidity analysis, evaluating strategic alternatives and financing-related workstreams, and advancing contingency planning in the event that a chapter 11 filing became necessary. Related to these efforts, A&M has worked closely with the Debtors' management and other restructuring professionals and has become well acquainted with the Debtors' capital structure, liquidity needs, cash flows, business operations, and general operating details.

7. As it became clear that the Debtors would pursue an in-court restructuring, A&M focused on, among other things, a comprehensive evaluation and analysis of the Debtors' operations and cash requirements to operate their business during these chapter 11 cases and upon emergence therefrom. To minimize the adverse effects on their business, the Debtors have filed

motions and pleadings seeking various types of “first day” relief (collectively, the “First Day Motions”). I submit this Declaration (a) to assist the Court and parties in interest in understanding the circumstances compelling the commencement of these chapter 11 cases and (b) in support of (i) the Debtors’ chapter 11 petitions and First Day Motions filed contemporaneously herewith and (ii) the relief requested by the Debtors pursuant to the First Day Motions.

Evidentiary Basis for Relief Requested in the First Day Motions

8. On the Petition Date, the Debtors have filed the following First Day Motions² seeking orders granting various forms of relief intended to stabilize the Debtors’ business operations and facilitate the efficient administration of these chapter 11 cases:

- **Automatic Stay Motion.** *Motion of Debtors Seeking Entry of an Order (I) Restating and Enforcing the Worldwide Automatic Stay, Anti-Discrimination Provisions, and Ipso Facto Protection of the Bankruptcy Code, (II) Approving the Form and Manner of Notice, and (III) Granting Related Relief.*
- **Cash Management Motion.** *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Perform Intercompany Transactions, and (II) Granting Related Relief.*
- **Claims, Noticing, and Solicitation Agent Retention.** *Application of Debtors for Entry of an Order (I) Authorizing the Debtors to Employ and Retain Kurtzman Carson Consultants, LLC DBA Verita Global as Claims and Noticing Agent Effective as of the Petition Date, and (II) Granting Related Relief.*
- **Creditor Matrix Motion.** *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Redact Certain Confidential Information of Customers, (B) Redact Certain Personally Identifiable Information of Individuals, and (C) Serve Certain Parties in Interest by*

² Contemporaneously herewith, the Debtors also filed *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Modifying the Automatic Stay, and (IV) Scheduling a Final Hearing, and (V) Granting Related Relief* (the “DIP Motion”) and, in support of the DIP Motion, the Grossi DIP Declaration and Singh DIP Declaration (each as defined in the DIP Motion).

Email, (II) Approving the Form and Manner of Service of the Notice of Commencement, and (III) Granting Related Relief.

- **Critical Vendors Motion.** *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Prepetition Claims of (A) Critical Vendors, (B) Foreign Vendors, (C) Lien Claimants, and (D) 503(b)(9) Claimants, (II) Confirming Administrative Expense Priority of Outstanding Orders, and (III) Granting Related Relief.*
- **Customer Programs Motion.** *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain and Administer Their Existing Customer Programs and (B) Honor Certain Prepetition Obligations Related Thereto and (II) Granting Related Relief.*
- **Factoring Motion.** *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Continue Performing Under the Factoring Program and (II) Granting Related Relief.*
- **Insurance Motion.** *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Insurance Coverage Entered into Prepetition and Pay Related Prepetition Obligations, (B) Renew, Supplement, Modify, or Purchase Insurance Coverage, (C) Maintain, Renew, or Supplement the Surety Bonds, and (D) Pay Brokerage Fees and (II) Granting Related Relief.*
- **Joint Administration Motion.** *Motion of Debtors for Entry of an Order (I) Directing the Joint Administration of Chapter 11 Cases and (II) Granting Related Relief.*
- **NOL Motion.** *Motion of Debtors for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and Preferred Stock and (II) Granting Related Relief.*
- **SOFA Motion.** *Motion of Debtors Seeking Entry of an Order (I) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases, Statements of Financial Affairs, and Rule 2015.3 Financial Reports and (II) Granting Related Relief.*
- **Taxes Motion.** *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Taxes and Fees and (II) Granting Related Relief.*
- **Utilities Motion.** *Motion of Debtors for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors' Proposed*

Procedures for Resolving Adequate Assurance Requests, and (IV) Granting Related Relief.

- **Wages Motion.** *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue the Compensation and Benefits Programs and (II) Granting Related Relief.*

9. I have reviewed and am familiar with the contents and substance of each First Day Motion (including the exhibits thereto) and have consulted with the Debtors' advisors to ensure that I understand each First Day Motion and the relief requested therein. To the best of my knowledge and belief, the factual statements contained in the First Day Motions are true and accurate and each such factual statement is incorporated herein by reference. Based on my knowledge, and after reasonable inquiry, I believe that the approval of the relief requested in the First Day Motions is (a) necessary to enable the Debtors to operate in chapter 11 with minimal disruption or loss of productivity or value; (b) critical to the Debtors' achieving a successful reorganization; and (c) in the best interests of the Debtors' estates and stakeholders. I believe that, if the Court does not grant the relief requested by the Debtors in the First Day Motions, the Debtors' business and their estates will suffer immediate and irreparable harm. Accordingly, for the reasons set forth in the First Day Motions, I believe that the relief requested in each of the First Day Motions is narrowly tailored to avoid immediate and irreparable harm and is appropriate under the circumstances and should be granted by the Court.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Dated: June 11, 2025

/s/ Tony Simion

Tony Simion
Managing Director
Alvarez & Marsal North America, LLC