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

In re:	)
	)
MARELLI AUTOMOTIVE LIGHTING USA LLC,	)
et al., <sup>1</sup>	)

Debtors.

Chapter 11

Case No. 25-11034 (CTG)

(Jointly Administered)

Re: Docket No. 122

# CERTIFICATION OF NO OBJECTION REGARDING MOTION OF DEBTORS FOR ENTRY OF AN ORDER (I) AUTHORIZING THE DEBTORS TO REDACT AND FILE UNDER SEAL THE TRANCHE A LENDER FEE LETTER AND (II) GRANTING RELATED RELIEF

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading has been received to the *Motion of Debtors for Entry of an Order (I) Authorizing the Debtors to Redact and File Under Seal the Tranche A Lender Fee Letter and (II) Granting Related Relief* (the "<u>Motion</u>") [Docket No. 122] filed on June 12, 2025. The undersigned further certifies that the Court's docket has been reviewed in this case and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the notice of Motion, objections to the Motion were to be filed and served no later than June 26, 2025 at 4:00 p.m. prevailing Eastern Time.

Accordingly, it is hereby respectfully requested that the proposed order attached

hereto as **Exhibit A** be entered at the Court's convenience.

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 <u>https://www.veritaglobal.net/Marelli</u>. 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.



Dated: July 1, 2025 Wilmington, Delaware

## /s/ Laura Davis Jones

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### -and-

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Proposed Co-Counsel for the Debtors and Debtors in Possession

Proposed Co-Counsel for the Debtors and Debtors in Possession

# Exhibit A

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

In re:

MARELLI AUTOMOTIVE LIGHTING USA LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11 Case No. 25-11034 (CTG)

(Jointly Administered)

Re: Docket No. 122

## ORDER (I) AUTHORIZING THE DEBTORS TO REDACT AND FILE UNDER SEAL THE TRANCHE A LENDER FEE LETTER AND (II) GRANTING RELATED RELIEF

Upon the motion (the "<u>Motion</u>")<sup>2</sup> of the above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>") for entry of an order (this "<u>Order</u>"), (a) authorizing the Debtors to redact and file the Confidential Information set forth in the Tranche A Lender Fee Letter; (b) directing that the Confidential Information shall remain under seal and confidential and not be made available to anyone, without the prior written consent of the Debtors and the Initial Tranche A Lender except to (i) the Court, (ii) the U.S. Trustee, (iii) counsel to any statutory committee appointed in these chapter 11 cases, and (iv) any other party as may be ordered by the Court or agreed to by the Debtors and the Initial Tranche A Lender, under appropriate confidentiality agreements reasonably satisfactory to the Debtors that preserve the confidentiality of the Confidential Information (and any information derived therefrom); and (c) granting related relief, all as more fully set forth in the Motion; and upon the First Day Declaration; and the *Amended* 

<sup>&</sup>lt;sup>1</sup> 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 <u>https://www.veritaglobal.net/Marelli</u>. 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.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

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*Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and the Court having found that the Debtors' notice of the Motion and opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and the Court having reviewed the Motion and having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor;

### **IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED as set forth herein.

2. The Debtors are authorized to file the Confidential Information under seal. The Confidential Information shall remain confidential and shall not be made available to anyone, other than as provided in paragraph 3 of this Order, without prior written consent of the Debtors and the Initial Tranche A Lender or further order of the Court.

3. The Debtors are authorized to cause the Confidential Information to be served on and made available, on a confidential basis, to: (a) the Court, (b) the U.S. Trustee, (c) counsel to any statutory committee appointed in these chapter 11 cases (on a confidential and professional eyes only basis), and (d) any other party as may be ordered by the Court or agreed to by the Debtors and the Initial Tranche A Lender, pursuant to appropriate confidentiality agreements satisfactory

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to the Debtors that preserve the confidentiality of the Confidential Information (and any information derived therefrom).

4. The Debtors and any party authorized to receive the Confidential Information pursuant to this Order shall, subject to Local Rule 9018-1(d) and without further order of the Court: (a) redact specific references to the information set forth therein from pleadings filed on the public docket maintained in these chapter 11 cases and (b) not use or refer to the information contained in the Confidential Information in any hearing unless appropriate safeguards have been put in place to protect the confidentiality of the information.

5. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion, and the requirements of the Bankruptcy Rules and the Local Rules are satisfied by such notice.

6. This Order is without prejudice to the rights of any party in interest to seek to unseal and make public any portion of the material filed under seal.

7. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

8. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

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