Case 25-11034-CTG Doc 218 Filed 07/01/25 Page 1 of 1 Docket #0218 Date Filed: 07/01/2025

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

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In re:

MARELLI AUTOMOTIVE LIGHTING USA LLC., et al.,¹

Debtors.

Chapter 11 Case No. 25-11034 (CTG) (Jointly Administered)

NOTICE OF RECLAMATION DEMAND

PLEASE TAKE NOTICE that on July 1, 2025, NORMA Pennsylvania, Inc. served a written demand for reclamation of goods pursuant to 11 U.S.C. § 546(c) upon the Debtors Marelli Automotive Lighting USA LLC., et al. by email communications to its counsel of record. Attached hereto as **Exhibit A** is a copy of the written demand with enclosures.

Respectfully Submitted,

Dated: July 1, 2025

BIELLI & KLAUDER, LLC

<u>/s/ David M. Klauder</u> David M. Klauder, Esquire (No. 5769) 1204 N. King Street Wilmington, DE 19801 Telephone: (302) 803-4600 Email: <u>dklauder@bk-legal.com</u>

Counsel for NORMA Pennsylvania, Inc.

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.

Exhibit A

1034-CTG Doc 218-1 Filed 07/01/25 Page 2 of 5



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Catherine A. Curtis 214.740.4049 | Direct Dial Catherine.curtis@wickphillips.com www.wickphillips.com

July 1, 2025

Via USPS and Email:

Joshua A. Sussberg Nicholas M. Adzima, Esq. Evan Swager, Esq. Kirkland & Ellis LLP 601 Lexington Avenue New York, NY 10022 joshua.sussberg@kirkland.com Ross M. Kwasteniet Spencer A. Winters, P.C. Kirkland & Ellis LLP 333 W. Wolf Point Plaza Chicago, IL 60654 ross.kwasteniet@kirkland.com Laura Davis Jones Timothy P. Cairns, Esq. Edward A. Corma, Esq. Pachulski Stang Ziehl & Jones LLP 919 N. Market St., 17th Fl. P.O. Box 8705 Wilmington, DE 19801 ljones@pszjlaw.com

In re Marelli Automotive Lighting USA LLC, et al. (collectively, the "Debtors") Case Re: No. 25-11034 (jointly administered) in the U.S. Bankruptcy Court for the District of Delaware (the "Bankruptcy Court") Reclamation and Demand by NORMA Pennsylvania, Inc. ("<u>NORMA</u>")

Dear Counsel:

This firm represents NORMA, supplier of goods to the Debtors through its subsidiaries and affiliates. NORMA hereby asserts its written demand of reclamation (the "Reclamation Demand") pursuant to Section 2-702 of the Uniform Commercial Code and Section 546(c) of the Bankruptcy Code for all goods (the "Goods") received by the Debtors listed in Exhibit A between April 27 and June 10, 2025. The Goods include, without limitation, engineered joining technology (metal clamps and plastic connectors). The Goods subject to this Reclamation Demand are valued at \$617,670.29. Supporting invoices for the Goods are confidential and proprietary and are not enclosed with this letter but are available upon request.

By this letter, the Debtors are instructed to immediately inventory the Goods, keep the Goods segregated from all other property of the Debtors, and provide NORMA a written account and summary disclosing the status of all Goods, to the extent such relief is consistent with the Bankruptcy Code and any order entered by the Bankruptcy Court.

NORMA reserves the right to further amend or supplement this Reclamation Demand, including providing additional evidence in support or submitting additional notices of claims. NORMA reserves all other claims at law or in equity, including but not limited to its rights to an allowed administrative claim pursuant to section 503(b)(9) of the Bankruptcy Code for all Goods received by the Debtors within twenty days before the commencement of the Debtors' bankruptcy Case 25-11034-CTG Doc 218-1 Filed 07/01/25 Page 3 of WICK PHILLIPS July 1, 2025 Page 2 of 4

cases, its rights under sections 503(b)(1)(A), 362(b)(3), 546(b)(1)(B), and 546(c) of the Bankruptcy Code, Section 2-702 of the Uniform Commercial Code, its contracts, applicable law, and any order of the Bankruptcy Court.

Please contact the undersigned immediately for instructions regarding the return of the Goods. If you do not authorize the return of the Goods promptly, we will take further appropriate measures.

Sincerely,

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Catherine A. Curtis

Enclosures: Debtor Counterparties

Case 25-11034-CTG Doc 218-1 Filed 07/01/25 Page 4 of **WICK PHILLIPS** July 1, 2025 Page 3 of 4

EXHIBIT A

Debtors

- 1. MARELLI Sosnowiec Poland Sp. z o.o.
- 2. MAGNETI MARELLI SISTEMAS AUTOMOTIVOS INDUSTRIA E COMERCIO LT
- 3. MARELLI INDUSTRIA E COMERCIO DE COMPONENTES AUTOMOTIVOS BRAS
- 4. MARELLI EUROPE S.P.A
- 5. Magneti Marelli
- 6. MARELLI Sosnowiec Poland Sp. z o.o.
- 7. Marelli North America Inc (Calsonic)

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was served on July 1, 2025, by the Court's ECF noticing system on all parties that consent to such service via electronic filing.

Dated: July 1, 2025

BIELLI & KLAUDER, LLC

<u>/s/ David M. Klauder</u> David M. Klauder, Esquire (No. 5769) 1204 N. King Street Wilmington, DE 19801 Telephone: (302) 803-4600 Email: <u>dklauder@bk-legal.com</u>

Counsel for NORMA Pennsylvania, Inc.