

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

IN RE:

MARELLI AUTOMOTIVE LIGHTING USA
LLC, *et al*,

Debtors.

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

NOTICE OF ENTRY OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that pursuant Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) 2002, 3017, 9007 and 9010, and Sections 342 and 1109 of Title 11 of the United States Code, 11 U.S.C. §101, et seq. (the “Bankruptcy Code”), Richard A. Barkasy, Esquire and Jon P. Newton, Esquire, hereby appear as counsel for Unifrax Holding LLC (“Unifrax”) in the above-captioned bankruptcy case; and such counsel hereby request that, pursuant to Bankruptcy Rules 2002, 3017 and 9007, they be placed on all mailing matrixes and that copies of all notices and pleadings served or filed in this case be served upon them at the following addresses:

Richard A. Barkasy, Esquire (No. 4683)
SANTORO LAW GROUP LLC
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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the rules specified above but also includes, without



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limitation, any notice, application, complaint, demand, motion, petition, pleading, disclosure statement, plan or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, overnight or hand delivery, email, facsimile, telephone or otherwise filed or made with regard to the above captioned case and all proceedings therein.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Papers shall not be deemed or construed to be a waiver of Unifrax's rights (1) to have an Article III judge adjudicate in the first instance any case, proceeding, matter or controversy as to which a Bankruptcy Judge may not enter a final order or judgment consistent with Article III of the U.S. Constitution; (2) to have final orders in noncore matters entered only after *de novo* review by a District Court Judge, (3) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (4) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (5) to raise any objection to jurisdiction and/or venue; and (6) to assert any other rights, claims, actions, setoffs, or recoupments to which Unifrax is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments Unifrax specifically reserves.

Dated: July 2, 2025

/s/ Richard A. Barkasy
Richard A. Barkasy, Esquire (No. 4683)
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CERTIFICATE OF SERVICE

I, Richard A. Barkasy, Esquire, certify that service of the foregoing Notice of Entry of Appearance and Request for Service of Papers was caused to be made on July 2, 2025 upon all parties of record via the CM/ECF system.

Date: July 2, 2025

/s/ Richard A. Barkasy

Richard A. Barkasy (No. 4683)