

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

MARELLI AUTOMOTIVE LIGHTING USA LLC,
et al.,¹

Debtors.

)
) Chapter 11
)
) Case No. 25-11034 (CTG)
)
) (Jointly Administered)
)
) **Re: Docket No. 487**

DECLARATION
OF DISINTERESTEDNESS OF
MARTINEZ ESTEBANEZ ABOGADOS ASOCIADOS S.C. PURSUANT TO THE ORDER
AUTHORIZING THE DEBTORS TO RETAIN AND COMPENSATE
PROFESSIONALS UTILIZED IN THE ORDINARY COURSE OF BUSINESS

I, **LIC. GUSTAVO ENRIQUE MARTINEZ ESTEBANEZ**, declare under penalty of perjury:

1. I am a LEGAL REPRESENTATIVE of **MARTINEZ ESTEBANEZ**

ABOGADOS ASOCIADOS S.C., located at 220 SIERRA DE LAS PALOMAS, BOSQUES
DEL PRADO SUR, AGUASCALIENTES, AGUASCALIENTES, MEXICO, 202127 (the "Firm").

2. Marelli Holdings Co., Ltd. and certain of its affiliates, as debtors and debtors in possession
(collectively, the "Debtors"), have requested that the Firm provide labor services and legal advice to the
Debtors, and the Firm has consented to provide such services.

3. The Firm may have performed services in the past, may currently perform services, and
may perform services in the future in matters unrelated to these chapter 11 cases for persons that are parties
in interest in the Debtors' chapter 11 cases. The Firm does not, however, perform services for any such
person relating to these chapter 11 cases, or have any relationship with any such person, their attorneys, or
their accountants that would be adverse to the Debtors or their estates with respect to the matter(s) upon

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 is 26555 Northwestern Highway, Southfield, Michigan 48033.



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which the Firm is to be employed.

4. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be employed by the Debtors, claimants, and parties in interest in these chapter 11 cases.

5. Neither I nor any principal, partner, director, or officer of, or professional employed by, the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principal and regular employees of the Firm.

6. Neither I nor any principal, partner, director, or officer of, or professional employed by, the Firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or their estates with respect to the matter(s) upon which the Firm is to be employed.

7. As of June 11, 2025, the Petition Date, the Debtors owed the Firm **\$27,659.14 USD** for prepetition services, the payment of which is subject to the limitations contained in title 11 of the United States Code, 11 U.S.C. §§ 101-1532.

8. The Firm was retained in June 2016.

9. As of the Petition Date, which was the date on which the Debtors commenced these chapter 11 cases, the Firm was not party to an agreement for indemnification with certain of the Debtors.

10. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Date: September 4th, 2025

A handwritten signature in blue ink, appearing to be "GUSTAVO ENRIQUE MARTINEZ ESTEBANEZ", written over a horizontal line.

LIC. GUSTAVO ENRIQUE MARTINEZ ESTEBANEZ