

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	)	
	)	Chapter 11
MARELLI AUTOMOTIVE LIGHTING USA LLC,	)	
<i>et al.</i> , ¹	)	Case No. 25-11034 (CTG)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	Obj. Date: October 3, 2025 at 4:00 p.m.
	)	Hearing Date: TBD if objection filed

COVER SHEET FOR:
SECOND MONTHLY FEE APPLICATION OF GREENBERG TRAURIG
STUDIO LEGALE ASSOCIATO FOR COMPENSATION AND
REIMBURSEMENT OF EXPENSES AS SPECIAL COUNSEL TO
DEBTORS AND DEBTORS IN POSSESSION FOR THE PERIOD
FROM JULY 1, 2025 THROUGH AND INCLUDING JULY 31, 2025

Name of Applicant: Greenberg Taurig Studio Legale Associato

Retention Order Entered August 26, 2025,
Nunc Pro Tunc to June 11, 2025

Authorized to Provide Professional Services to: Debtors and Debtors in Possession

Period for which compensation and Reimbursement is sought: July 1, 2025 –July 31, 2025

Amount of Compensation sought as actual, reasonable and necessary: \$665,841.29
(80% = \$532,673.03)
(20% = \$133,168.26)

Amount of pass-through charges to be paid by the Debtors: \$130,549.59

Amount of Expense Reimbursement sought as actual, reasonable and necessary: \$1,059.92

This is a(n)___interim X monthly ___ final fee application.

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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This Application does not include any hours incurred in connection with preparation of this Application.

SUMMARY OF MONTHLY FEE APPLICATIONS

Date Filed and Docket No.	Period Covered	Requested		Approved		Holdback Fees (20%)
		Fees	Expenses	Fees (80%)	Expenses (100%)	
D.I. 925, filed September 11, 2025	June 11, 2025 through June 30, 2025	\$476,101.56	\$1,410.84 plus \$93,374.68 in pass-through charges	n/a	n/a	n/a

COMPENSATION BY INDIVIDUAL

Attorney Name	Position	Department	Date of Admission	Hourly Billing Rate in this application	Hours Billed in this application	Fees Billed in this application
Agostinelli, Riccardo	Partner	Bankruptcy & Restructuring	1992	\$1,373.52	128.60	\$176,634.67
Basilisco, Martino	Associate	EU Law	2023	\$457.84	4.50	\$2,060.28
Biscaretti di Ruffia, Bertone	Senior Associate	Litigation	2017	\$572.30	2.40	\$1,373.52
Burrafato, Giuseppe Federico	Senior Associate	Corporate	2019	\$572.30	17.50	\$10,015.25
Cupolo, Cristina	Senior Associate	Bankruptcy & Restructuring	2022	\$572.30	236.00	\$135,062.80
Faraone, Giorgia	Trainee	Corporate	NA	\$280.43	1.30	\$364.56
Gambaro, Edoardo	Partner	EU Law	2003	\$1,373.52	2.00	\$2,747.04
Meloro, Dennis A.	Partner	Bankruptcy & Restructuring	2003	\$1,373.52	2.30	\$3,159.10
Migliarucci, Daniele	Partner	Bankruptcy & Restructuring	2014	\$1,373.52	211.00	\$289,812.72
Missanelli, Pietro	Senior Associate	EU Law	2016	\$572.30	2.50	\$1,430.75
Napoli, Caterina A.	Counsel	Bankruptcy & Restructuring	2004	\$686.76	2.50	\$1,716.90
Naronte, Lucrezia	Trainee	Bankruptcy & Restructuring	NA	\$280.43	15.90	\$4,458.79
Pallavicini, Alessandro	Senior Associate	Bankruptcy & Restructuring	2019	\$572.30	29.50	\$16,882.85
Soci, Lorenzo	Associate	Bankruptcy & Restructuring	2023	\$457.84	1.50	\$686.76
Torricelli, Francesca	Partner	Corporate	2006	\$1,373.52	8.00	\$10,988.16
Pozzoli, Davide	Counsel	Litigation	2009	\$686.76	3.90	\$2,678.36
Ruvolo, Alessio G.	Partner	Bankruptcy & Restructuring	2001	\$1,373.52	4.20	\$5,768.78
Totals for Attorneys & Trainees					673.60	\$665,841.29

EXPENSE SUMMARY

Expense Category	Total Expenses
Standard Copies or Prints	\$247.00
Local Transportation	\$176.27
Overtime Meals	\$636.65
TOTALS:	\$ 1,059.92

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

In re:	)	
	)	Chapter 11
	)	
MARELLI AUTOMOTIVE LIGHTING USA LLC,	)	Case No. 25-11034 (CTG)
<i>et al.</i> , ¹	)	
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	Obj. Date: October 3, 2025 at 4:00 p.m.
	)	Hearing Date: TBD if objection filed

**SECOND MONTHLY FEE APPLICATION OF GREENBERG TRAURIG
STUDIO LEGALE ASSOCIATO FOR COMPENSATION AND
REIMBURSEMENT OF EXPENSES AS SPECIAL COUNSEL TO
DEBTORS AND DEBTORS IN POSSESSION FOR THE PERIOD
FROM JULY 1, 2025 THROUGH AND INCLUDING JULY 31, 2025**

Greenberg Traurig Studio Legale Associato (“**Greenberg Traurig**”), special counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”), hereby submits its second monthly application (the “**Application**”) for compensation and reimbursement of expenses for the period from July 1, 2025 through and including July 31, 2025 (the “**Application Period**”) pursuant to sections 330 and 331 of title 11 of the United States Code 11 U.S.C. §§ 101, *et seq.* (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), and this Court’s *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief* [Docket No. 477] (the “**Interim Compensation Order**”).

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.

By this Application, Greenberg Traurig seeks a monthly interim approval and allowance of compensation in the amount of \$665,841.29 and reimbursement of actual expenses in the amount of \$1,059.92, plus certain charges in the aggregate amount of \$130,549.59, for an aggregate total of \$797,540.80 in accordance with the Interim Compensation Order. Greenberg Traurig hereby seeks payment of \$532,673.03 (80% of the allowed fees) and reimbursement of \$1,059.92 (100% of allowed expenses), plus certain charges detailed herein in the aggregate amount of \$130,549.59 (detailed in paragraph 8 below), for an aggregate total payment of \$664,282.54 for the Application Period, upon the filing of a certificate of no objection. In support of the Application, Greenberg Traurig respectfully represents as follows:

Background

1. On June 11, 2025 (the “**Petition Date**”), the Debtors commenced these cases (the “**Chapter 11 Cases**”) by filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

2. The Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this district pursuant to 28 U.S.C. § 1408. This matter is core within the meaning of 28 U.S.C. § 157(b)(2).

3. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-2.

4. On August 8, 2025, the Debtors filed the *Debtors’ Application for Authorization to Employ and Retain Greenberg Traurig Studio Legale Associato as Special Counsel for the Debtors Effective as of the Petition Date* [Docket No. 501].

5. On August 26, 2025, this Court entered the *Order Authorizing the Employment and Retention of Greenberg Traurig Studio Legale Associato as Special Counsel for the Debtors Effective as of the Petition Date* [Docket No. 752].

Summary of Services Rendered

6. This Application is the second monthly fee application filed by Greenberg Traurig in these Chapter 11 Cases. In connection with the professional services described below, by this Application, Greenberg Traurig seeks interim approval and allowance of compensation in the amount of \$665,841.29 for the Application Period and reimbursement of actual and necessary expenses in the amount of \$1,059.92 for the Application Period, and payment of \$532,673.03 (80% of the allowed fees) and reimbursement of \$1,059.59 (100% of allowed expenses), plus certain charges detailed herein in the aggregate amount of \$130,549.59, for an aggregate total payment of \$664,282.54 for the Application Period upon the filing of a certificate of no objection.

7. The majority of services rendered by Greenberg Traurig during the Application Period as special counsel to the Debtors are summarized below. Each of the following is set forth in the invoice attached hereto as **Exhibit “A”**: (i) a description of the professional or paraprofessional performing the services; (ii) the date the services were performed; (iii) a detailed description of the nature of the services and the related time expended; and (iv) a summary of the fees and hours of each professional and other timekeepers listed by project category (which applicable categories are set forth below). Specifically, Greenberg Traurig rendered the following services during the Application Period as special counsel to the Debtors:

- o Assistance to the companies (including working with directors, statutory auditors and external auditors (Deloitte) with the approval of the 2024 financial statement.
- o Implementation of Italian-related DIP Financing post-closing obligations (including the several Italian law security documents, legal opinions and deliverables related thereto).
- o Golden Power procedure as a condition precedent to creation of the share pledges over Italian entities in connection with the implementation of the security package under the DIP financing and change of ownership of the Marelli Group.

- o Assistance to the companies in connection with the handling of the relationship with local suppliers and vendors. Greenberg Traurig is engaged in negotiations with suppliers and vendors of the Italian entities.
- o Implementation of a recovery plan, including potential recognition of the Debtors chapter 11 plan in Italy, for the Italian entities under Article 56 of the Italian Bankruptcy Law.
- o Italian public grants (support to local management and communication with Italian authorities relating to public support from the government for research programs and similar).
- o Addressing Italian labor law issues.

Summary of Expenses and Charges

8. During the Application Period, Greenberg Traurig incurred or disbursed actual and necessary costs and expenses related to these cases in the aggregate amount of \$1,059.92. The expenses incurred include, among other things, copying and service charges, transportation and overtime meal charges. In addition, certain amounts, as disclosed in Greenberg Traurig's retention application, including a Charge pursuant to Decree No. 55 of 03/10/2014 in the amount of \$99,876.19, a Pension Fund charge of \$30,671.10, and a Duty Stamp in the amount of \$2.30 are payable by the Debtors (initially to Greenberg Traurig, and then submitted to the appropriate agency). A description of the necessary costs and expenses incurred by Greenberg Traurig and the charges is attached hereto as **Exhibit "B"**.

9. Pursuant to Local Rule 2016-1, Greenberg Traurig represents as follows with regard to its charges for actual and necessary costs and expenses incurred during the Application Period:

a. Copy Charges were \$.10 per page, which charge is reasonable and customary in the legal industry and represents the costs of copy material, acquisition, maintenance, storage and operation of copy machines, together with a margin for recovery of related expenditures. In addition, Greenberg Traurig often utilizes outside copier services for high volume

projects, and this Application seeks the recovery of those costs, if applicable;

- b. Incoming facsimiles are not billed;
- c. Out-going facsimiles are billed at the rate of \$0.25 per page. The cost represents operator time, maintaining several dedicated facsimile telephone lines, supplies and equipment, and includes a margin for recovery of related expenditures;
- d. Toll telephone charges are not billed; and
- e. Computer assisted legal research charges are billed at actual costs.

Valuation of Services

10. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amounts requested herein for compensation and expense reimbursement are fair and reasonable given (a) the complexity of these cases, (b) the time expended by the attorneys and paraprofessionals at Greenberg Traurig, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

11. Greenberg Traurig hereby certifies (i) that it has reviewed the requirements of Local Rule 2016-2 and (ii) that this Application complies with such rule.

12. Greenberg Traurig has provided a copy of this Application to the Debtors, the United States Trustee, and all parties required to be given notice as set forth in Paragraph 2(a) of the Interim Compensation Order.

Sources of Payment

13. As stated above, Greenberg Traurig hereby seeks payment of \$532,673.03 (80% of the allowed fees) and reimbursement of \$1,059.92 (100% of allowed expenses), plus certain charges in the aggregate amount of \$130,549.59 (detailed in paragraph 8 above) for an aggregate

total payment of \$664,282.54 for the Application Period upon the filing of a certificate of no objection.

Conclusion

WHEREFORE, Greenberg Traurig respectfully requests (a) that the Court approve and allow compensation in the amount of \$665,841.29 for professional services rendered (80%, or \$532,673.03, of which is to be paid upon the filing of a certificate of no objection), and reimbursement of expenses in the amount of \$1,059.92 (100% of which is to be paid upon the filing of a certificate of no objection) for the Application Period on an interim basis, plus certain charges in the aggregate amount of \$130,549.59; and (b) that the Court authorize and direct the Debtors to pay Greenberg Traurig the amounts due and owing hereunder in accordance with the Interim Compensation Order.

Dated: September 12, 2025

GREENBERG TRAURIG, LLP

/s/ Dennis A. Meloro

Dennis A. Meloro (DE Bar No. 4435)

222 Delaware Avenue, Suite 1600

Wilmington, Delaware 19801

Telephone: (302) 661-7000

Facsimile: (302) 661-7360

Email: Dennis.Meloro@gtlaw.com

Special Counsel for the Debtors and Debtors in Possession

**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)

VERIFICATION OF RICCARDO AGOSTINELLI

I, Riccardo Agostinelli, hereby declare the following under penalty of perjury:

I am a partner in the law firm of Greenberg Traurig Studio Legale Associato (“**Greenberg Traurig**” or the “**Firm**”), located at Galleria San Babila 4B, 20122 – Milan (Italy) (registered office: Largo Toscanini 1, 20122 – Milan (Italy)), and I have been duly admitted to practice law in Italy (Bar council of Milan). There are no disciplinary proceedings pending against me.

I have personally performed many of the legal services rendered by Greenberg Traurig as special counsel to the Debtors and am familiar with all other work performed on behalf of the Debtors by the lawyers and other persons in the Firm.

The facts set forth in the foregoing Monthly Fee Application are true and correct to the best of my knowledge, information, and belief.

I have reviewed Rule 2016-1 of the Local Rules and believe that the Monthly Fee Application for Greenberg Traurig complies with Rule 2016-1.

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

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.

Dated: September 12, 2025

/s/ Riccardo Agostinelli

Riccardo Agostinelli

Partner

Greenberg Traurig Studio Legale Associato

Exhibit A

Description of Professional Services Rendered: Proforma Marelli July 31st 2025

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Description</u>
01/07/2025	Cristina Cupolo	7,00	Review of documents (4) / e-mail (3)
01/07/2025	Cristina Cupolo	8,00	Review and drafting of post-closing documents (4) / e-mail (4)
01/07/2025	Daniele Migliarucci	10,00	Vendors/suppliers workstream & draft/negotiation of applicable Trade Agreement (4); Golden Power workstream re Italian security (2.5); post-closing obligations (2); calls (0.5); email correspondence (0.5); case management (0.5)
01/07/2025	Riccardo Agostinelli	2,00	coordination of GT team on various streams of work, including DIP financing, art 56 and golden power
02/07/2025	Alessandro Pallavicini	1,00	German security documents
02/07/2025	Cristina Cupolo	5,00	Drafting of table summarizing Italian post closing security / e-mail and correspondence with GOP
02/07/2025	Cristina Cupolo	5,00	Review of documents
02/07/2025	Daniele Migliarucci	9,50	Vendors/suppliers workstream & draft/negotiation of applicable Trade Agreement (4); Golden Power workstream re Italian security (2); post-closing obligations (2); calls (0.5); email correspondence (0.5); case management (0.5)
02/07/2025	Riccardo Agostinelli	1,00	Art.56: issues related to carve out of Italian business plan from the global business plan (which is structured by business centres and not legal entities): possible solutions
02/07/2025	Riccardo Agostinelli	2,00	Suppliers: issues related to pre-filing and post-filing claims. Interaction with Italian provisions of law. Preparation of arguments to support negotiation with suppliers. Summary of Ch 11 and Art. 56 (protection from claw-back). Recognition of Ch 11 in Italy
02/07/2025	Riccardo Agostinelli	1,00	Issues related to pre-filing and post-filing claims. Interaction with Italian provisions of law. Preparation of arguments to support negotiation with suppliers. Summary of Ch 11 and Art. 56 (protection from claw-back). Recognition of Ch 11 in Italy
03/07/2025	Alessandro Pallavicini	3,00	Security documents (2) and emails (1)
03/07/2025	Alessandro Pallavicini	1,50	Security process (1) - emails (0,5)
03/07/2025	Cristina Cupolo	7,00	Drafting of a summary of the transaction (4) / drafting and review of documents in relation to the German security document (3)
03/07/2025	Cristina Cupolo	4,00	Review of documents / e-mail
03/07/2025	Daniele Migliarucci	10,00	Vendors/suppliers workstream & draft/negotiation of applicable Trade Agreement (5); Golden Power workstream re Italian security (2); post-closing obligations (1.5); calls (0.5); email correspondence (0.5); case management (0.5)
03/07/2025	Martino Basilisco	3,50	Analysis of state aid issues on elettrivori matter. drafting internal note.
03/07/2025	Riccardo Agostinelli	2,00	Supplier: negotiation of TA with Marcegaglia
03/07/2025	Riccardo Agostinelli	1,40	Supplier: negotiation of TA with Brovcolani
03/07/2025	Riccardo Agostinelli	2,20	Supplier: negotiation of TA with ISB
03/07/2025	Riccardo Agostinelli	2,00	BP. SONDRIO: issues from the bank and answers
03/07/2025	Riccardo Agostinelli	1,50	Art. 56: coordination of activity for its implementations
04/07/2025	Cristina Cupolo	8,00	Review of German law security (2) / e-mail (3) / drafting of CPs (2) / review of procurement contract (1)
04/07/2025	Daniele Migliarucci	8,00	Vendors/suppliers workstream & draft/negotiation of applicable Trade Agreement (3); Golden Power workstream re Italian security (2); post-closing obligations (1); calls (1); email correspondence (0.5); case management (0.5)
04/07/2025	Edoardo Gambaro	1,00	Esame bozza email su impresa in difficoltà
04/07/2025	Giuseppe Federico Burrafato	4,00	Review of Marelli Puurchase T&C entered into with EFTEC Engineering GmbH - Analysis case law - drafting answer to K&E questions
04/07/2025	Pietro Missanelli	1,50	Drafting communication to Client re aid for project with ENI Plenitude
04/07/2025	Riccardo Agostinelli	4,50	Team co-ordination on different work streams: DIP, art 56, vendors/suppliers, balance sheet approval by local subsidiaries
04/07/2025	Francesca Torricelli	1,00	Review of email from Benjamin KE re the commercial agreement between the Polish and German entity and questions under Italian law + internal review and follow up with Giuseppe Burrafato for reply inputs
05/07/2025	Cristina Cupolo	1,00	Review of documents / e-mail
07/07/2025	Alessandro Pallavicini	2,00	Review emails and documents (0,5) - german security (1,5)
07/07/2025	Alessandro Pallavicini	1,00	Security process (0,5) - emails (0,5)
07/07/2025	Caterina A Napoli	2,50	Exam of email correspondence; exam of the factoring agreement with MBFactor and the set on amendments thereto; internal interactions; exam of queries raised by K&E; video conference
07/07/2025	Cristina Cupolo	6,00	Review and drafting of documents in connection with the German security / e-mail
07/07/2025	Daniele Migliarucci	9,00	Vendors/suppliers workstream; negotiation of the Trade Agreement as per Chapter 11 Critical Vendors Order (4.5); DIP financing post-closing obligations workstream; security documents; Italian deliverables (2.5); calls (0.5); email correspondence (1); case management (0.5)
07/07/2025	Lorenzo Soci	1,50	Doc. Review, various correspondence and calls to prepare for conference call with K&E on matter with factoring bank. Conference call.

Description of Professional Services Rendered: Proforma Marelli July 31st 2025

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Description</u>
07/07/2025	Riccardo Agostinelli	3,50	Suppliers: issues related to the recognition/non-recognition of A Stay under Ch 11 in Italy
07/07/2025	Riccardo Agostinelli	1,50	Art. 56: issues related to carve out of Italian business plan from the global business plan (which is structured by business centres and not legal entities): possible solutions
07/07/2025	Riccardo Agostinelli	1,50	Banking: legal opinion issues
07/07/2025	Riccardo Agostinelli	1,00	Factoring: issues about blockage of the factoring credit facilities
07/07/2025	Ralessio G. Ruvolo	4,20	Review and consideration of request from Evan Swager to talk through some issues arisen with MB Facta S.p.A.(0,5)+ Phone conversation with Riccardo Agostinelli.(0,2) + Exchange of emails with Riccardo Agostinelli on approach to the issues and request for further indications.(0,5) + Review of the relevant Factoring Agreement and check of allocation to respective teams during the DD. (0,5) + Review and internal preliminary discussion on issues: • On prepetition "claims" owed to factoring banks as assets held in trust by the Company (i.e., not property of the estate) • How factoring banks enforce their rights and collect those amounts from the Company(0,5)+ Timeline. - Liability associated therewith, and possible delay of payment for ~6 months or so and consequences to the Company? (0,5) + Review of past opinion on these issues in view of conf call.(0,5) + Drafting and sending of summary of analysis to Riccardo in view of call to assure consistency of position; listing of possible options to delay payment by the Company and relevant risks. + Checks with team on relevant agreements. (0,5)+ Follow up emails and talks with Riccardo in view of the call with Evan. + Attendance of phone call and subsequent follow up on call with Riccardo.(0,5) +
08/07/2025	Alessandro Pallavicini	1,50	CPs (1) and security process (0,5)
08/07/2025	Alessandro Pallavicini	2,00	Security process (1,5) - emails (0,5)
08/07/2025	Cristina Cupolo	5,00	Review of documents in connection with the German security to be granted
08/07/2025	Daniele Migliarucci	10,00	Vendors/suppliers workstream; negotiation of the Trade Agreement as per Chapter 11 Critical Vendors Order (4); DIP financing post-closing obligations workstream; security documents; Italian deliverables (4); calls (1); email correspondence (0,5); case management (0,5)
08/07/2025	Riccardo Agostinelli	2,00	N.Holding: negotiation of TA
08/07/2025	Riccardo Agostinelli	1,50	Parco: negotiation of TA
08/07/2025	Riccardo Agostinelli	3,50	Factoring: issues about blockage of the factoring credit facilities
08/07/2025	Riccardo Agostinelli	0,50	Marcegoglia: negotiation of TA
08/07/2025	Riccardo Agostinelli	0,50	Brovedani: negotiation of TA
08/07/2025	Riccardo Agostinelli	1,50	Company: further issues on balance sheet approval
08/07/2025	Riccardo Agostinelli	0,50	Comet: negotiation of TA
09/07/2025	Alessandro Pallavicini	1,50	CPs (1) and security process (0,5)
09/07/2025	Alessandro Pallavicini	2,00	Security process (1) - emails (1)
09/07/2025	Cristina Cupolo	7,00	Review of German security document / review of formalities certificate and corporate documents / e-mail / review of checklist from K&E
09/07/2025	Daniele Migliarucci	10,00	Vendors/suppliers workstream; negotiation of the Trade Agreement as per Chapter 11 Critical Vendors Order (3); DIP financing post-closing obligations workstream; security documents; Italian deliverables (5); calls (0,5); email correspondence (1); case management (0,5)
09/07/2025	Lucrezia Naronte	0,30	Italian post closing security call
09/07/2025	Riccardo Agostinelli	3,00	coordination of GT team on various streams of work, including DIP financing, art 56 and golden power
09/07/2025	Riccardo Agostinelli	1,00	Art. 56: activation of accounting DD
10/07/2025	Alessandro Pallavicini	1,50	CPs and Security process (1) - emails (0,5)
10/07/2025	Alessandro Pallavicini	2,00	Security process(1) - emails (1)
10/07/2025	Cristina Cupolo	8,00	Activities ahead of signing of the German security / e-mail / drafting of BoD minutes for Marelli Europe
10/07/2025	Daniele Migliarucci	9,00	Vendors/suppliers workstream; negotiation of the Trade Agreement as per Chapter 11 Critical Vendors Order (4); DIP financing post-closing obligations workstream; security documents; Italian deliverables (3); calls (1); email correspondence (0,5); case management (0,5)
10/07/2025	Riccardo Agostinelli	3,50	Suppliers: issues related to pre-filing and post-filing claims. Interaction with Italian provisions of law. Preparation of arguments to support negotiation with suppliers. Summary of Ch 11 and Art. 56 (protection from claw-back). Recognition of Ch 11 in It
10/07/2025	Riccardo Agostinelli	2,50	Banking -DIP limitation wording for non-italian item of the security package
11/07/2025	Alessandro Pallavicini	1,50	CPs and Security process (1) - emails (0,5)
11/07/2025	Cristina Cupolo	10,00	Signing of the German guarantee (2) / review of documents (3) / e-mail (2) / drafting o BoD minutes for Marelli Eruope (3)

Description of Professional Services Rendered: Proforma Marelli July 31st 2025

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Description</u>
11/07/2025	Daniele Migliarucci	8,50	Vendors/suppliers workstream; negotiation of the Trade Agreement as per Chapter 11 Critical Vendors Order (5); DIP financing post-closing obligations workstream; security documetns; Italian deliverables (2); calls (0.5); email correspondence (0.5); case management (0.5)
11/07/2025	Lucrezia Naronte	2,00	Traduzione verbale CdA
11/07/2025	Riccardo Agostinelli	1,00	Banking: capacity opinion issues
11/07/2025	Riccardo Agostinelli	1,00	Art. 56: need of the look forward cash flow test as part of the BP
11/07/2025	Riccardo Agostinelli	2,00	coordination of GT team on varius streams of work, including DIP financing, art 56 and golden power
11/07/2025	Riccardo Agostinelli	1,00	Review of documents: various Tas
12/07/2025	Alessandro Pallavicini	7,00	Emails (1) and review of docs (6)
14/07/2025	Cristina Cupolo	8,00	Review of BoD minutes (2) / review of German law documents and post closing deliverables (4) / e-mail (2)
14/07/2025	Daniele Migliarucci	8,00	Marelli Italian vendors' workstream; negotiation of trade agreement; calls with multiple vendors (3); DIP financing post-closing obligations workstream; review of new Marelli Europe board resolution and other Italian deliverables (3.5); email correspondence (1); case management (0.5)
14/07/2025	Riccardo Agostinelli	1,00	Art. 56 vs CNC: CNC to take advantage from a Stay
14/07/2025	Riccardo Agostinelli	3,00	Suppliers: CMS TA negotiation and preparation
14/07/2025	Riccardo Agostinelli	2,00	Banking structure of the DIP security package
15/07/2025	Cristina Cupolo	9,00	Review and drafting of post-closing documents (5) / e-mail (4)
15/07/2025	Cristina Cupolo	3,00	Review of documents
15/07/2025	Daniele Migliarucci	8,50	Marelli Italian vendors' workstream; negotiation of trade agreement; calls with multiple vendors (3.5); DIP financing post-closing obligations workstream (2.5); review of new Marelli Europe board resolution and other Italian deliverables (1.5); email correspondence (0.5); case management (0.5)
15/07/2025	Riccardo Agostinelli	1,00	Litigation issues Aftermarket
15/07/2025	Riccardo Agostinelli	3,00	coordination of GT team on varius streams of work, including DIP financing, art 56 and golden power
16/07/2025	Cristina Cupolo	8,00	Review and drafting of post-closing documents (including PoAs) (4) / e-mail (4)
16/07/2025	Daniele Migliarucci	8,00	Italian vendors workstream; negotiation of several Trade Agreements; calls with suppliers (4); DIP financing post closing obligations workstream; CPs; Italian security documents (2.5); calls (0.5); email correspondence (0.5); case management (0.5)
16/07/2025	Lucrezia Naronte	1,00	Procura pegno francese
16/07/2025	Riccardo Agostinelli	2,50	Suppliers: negotiation with Parco and preparation
16/07/2025	Riccardo Agostinelli	1,00	Banking issues: coordination of GT team
16/07/2025	Riccardo Agostinelli	0,50	Art. 56: need of CNC for a Stay
17/07/2025	Cristina Cupolo	9,00	Review and drafting of post-closing documents (including PoAs) (5) / e-mail (4)
17/07/2025	Daniele Migliarucci	8,50	Italian vendors workstream; negotiation of several Trade Agreements; calls with suppliers (4); DIP financing post closing obligations workstream; CPs; Italian security documents (3); calls (0.5); email correspondence (0.5); case management (0.5)
17/07/2025	Lucrezia Naronte	1,00	Procure
17/07/2025	Riccardo Agostinelli	2,00	coordination of GT team on varius streams of work, including DIP financing, art 56 and suppliers
17/07/2025	Riccardo Agostinelli	1,00	Balance sheet issues: timing for approval and responsibility of local auditors
18/07/2025	Cristina Cupolo	12,00	Review and coordination of PoAs (6) / e-mail (6)
18/07/2025	Daniele Migliarucci	7,50	Italian vendors workstream; negotiation of several Trade Agreements; calls with suppliers (3); DIP financing post closing obligations workstream; CPs; Italian security documents (3); calls (0.5); email correspondence (0.5); case management (0.5)
18/07/2025	Giuseppe Federico Burrafato	4,00	Analysis Of documents provided in connection with the postponement of the financial statement / Drafting shareholder meeting minutes for the postponement of the financial statement approval
18/07/2025	Riccardo Agostinelli	3,00	coordination of GT team on varius streams of work, including DIP financing, art 56 and vendors
21/07/2025	Cristina Cupolo	10,00	Coordination, review and drafting of local PoAs (5) / review fo documents (3) / e-mail (2)
21/07/2025	Daniele Migliarucci	10,00	Critical vendors workstream; several calls with suppliers & vendors; negotiation of the Trade Agreements (4); DIP financing post-closing obligations workstream; documents review and closign deliverables (3); matters & discussions re approval of Italian financial statements on a going concern basis (2); email correspondence (0.5); case management (0.5)
21/07/2025	Giorgia Faraone	1,30	Internal meeting and research on FS
21/07/2025	Giuseppe Federico Burrafato	2,50	Analysis of the Board of Statutory Auditors' report in connection with the postponement of the approval of the financial statements of Marelli Europe S.p.A
21/07/2025	Lucrezia Naronte	1,30	Ricerca

Description of Professional Services Rendered: Proforma Marelli July 31st 2025

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Description</u>
21/07/2025	Riccardo Agostinelli	3,50	Statutory Auditors: issues on corporate benefit and balance sheet approval
21/07/2025	Riccardo Agostinelli	2,50	issues related to the DIP financing issued by GOP
21/07/2025	Francesca Torricelli	2,00	Preliminary review of minutes of the prospected Shareholders meeting called for fin. statements approval + Review of Board of Auditors report challenging the possibility to postpone the approval + internal meeting with RA team in order to prepare next steps
22/07/2025	Alessandro Pallavicini	1,50	Emails (0,5) - security documents (1)
22/07/2025	Cristina Cupolo	10,00	Coordination, review and drafting of local PoAs (4) / e-mail (3) / review of documents (3)
22/07/2025	Daniele Migliarucci	9,50	Critical vendors workstream; several calls with suppliers & vendors; negotiation of the Trade Agreements (3.5); DIP financing post-closing obligations workstream; documents review and closing deliverables (3.5); matters & discussions re approval of Italian financial statements on a going concern basis (1.5); email correspondence (0.5); case management (0.5)
22/07/2025	Giuseppe Federico Burrafato	3,50	Case law analysis on financial statement approval deadlines exceeding 180 days – postponement of the shareholders' meeting – potential sanctions"
22/07/2025	Lucrezia Naronte	1,00	Ricerca
22/07/2025	Riccardo Agostinelli	3,00	Balance sheet issues
22/07/2025	Riccardo Agostinelli	2,50	Suppliers: negotiation of TA with Parco
22/07/2025	Francesca Torricelli	4,00	Legal searches re the extended term for financial statements approval: case law and application to distressed situations (3) + internal meeting with team re next steps (1)
23/07/2025	Cristina Cupolo	13,00	Review and coordination of PoAs and related documents with local counsel (9) / e-mail (4)
23/07/2025	Daniele Migliarucci	10,00	Critical vendors workstream; several calls with suppliers & vendors; negotiation of the Trade Agreements (3.5); DIP financing post-closing obligations workstream; documents review and closing deliverables (3.5); matters & discussions re approval of Italian financial statements on a going concern basis (1.5); email correspondence (1); case management (0.5)
23/07/2025	Giuseppe Federico Burrafato	3,50	Memo on the Nature and Limits of the Deadline for Financial Statement Approval – Postponement in Corporate Distress Scenarios and Related Sanctions – Meetings with the Restructuring Team
23/07/2025	Lucrezia Naronte	2,00	Ricerca
23/07/2025	Riccardo Agostinelli	5,00	Suppliers: negotiation with Algo + new observations from statutory auditors
23/07/2025	Francesca Torricelli	1,00	Review of email from Nicoletta Boscarato re the shareholders meeting minute required to postpone financial statements approval + internal follow up call on next steps
23/07/2025	Davide Pozzoli	3,90	Legal research re: foreign stay of actions and effects in Italy(1,4). Short meeting with Riccardo Agostinelli and Bertone Biscaretti re: scope of the analysis (0,5). Revising and integrating a short draft memorandum on the issue (2).
24/07/2025	Cristina Cupolo	13,00	Review and coordination of PoAs with local counsel (5) / e-mail (5) / review of GP Notice (2)
24/07/2025	Daniele Migliarucci	10,00	Critical vendors workstream; several calls with suppliers & vendors; negotiation of the Trade Agreements (3.5); DIP financing post-closing obligations workstream; documents review and closing deliverables (3.5); Italian Golden Power workstream (1.5); email correspondence (1); case management (0.5)
24/07/2025	Riccardo Agostinelli	2,50	Statutory auditors issues
24/07/2025	Riccardo Agostinelli	3,50	Suppliers: negotiation with EXIDE and FACTORIT
25/07/2025	Cristina Cupolo	12,00	Review and coordination of PoAs (4) / review of BoD minute and formalities certificate (4) / e-mail (4)
25/07/2025	Daniele Migliarucci	8,00	Critical vendors workstream; several calls with suppliers & vendors; negotiation of the Trade Agreements (4); DIP financing post-closing obligations workstream; documents review and closing deliverables (2); Italian Golden Power workstream (1); email correspondence (0.5); case management (0.5)
25/07/2025	Edoardo Gambaro	1,00	Review comments to Italian FDI form
25/07/2025	Lucrezia Naronte	1,30	Documentazione
25/07/2025	Martino Basilisco	1,00	Revisione formulario golden power. redazione nota interna
25/07/2025	Pietro Missanelli	1,00	Review intervention on draft FDI form
25/07/2025	Riccardo Agostinelli	2,50	coordination of GT team on various streams of work, including DIP financing, art 56 and suppliers
25/07/2025	Riccardo Agostinelli	2,00	Suppliers: issues related to EXIDE and FACTORIT
25/07/2025	Riccardo Agostinelli	0,50	ART. 56: carve out of Italian perimeter
25/07/2025	Riccardo Agostinelli	1,50	Potential litigation and solution for a Stay
25/07/2025	Riccardo Agostinelli	1,50	Balance sheet issues
26/07/2025	Cristina Cupolo	3,00	Review and coordination of PoAs

Description of Professional Services Rendered: Proforma Marelli July 31st 2025

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Description</u>
28/07/2025	Bertone Biscaretti di Ruffia	2,40	Legal analysis of the recognition and effect in Italy of a court order issued by a Delaware court in Chapter 11 proceedings. Briefing with R. Agostinelli and D. Pozzoli. Legal research. Drafting of response to client. Review. Correspondence.
28/07/2025	Cristina Cupolo	13,00	Coordination and review of PoAs from different jurisdictions (7) / e-mail (5)
28/07/2025	Daniele Migliarucci	10,00	Marelli Critical Vendors workstream; negotiation of TAs; several calls (4); DIP post closing obligations workstream; documents review (2); GP notice (1); preparation of board meetings for Italian companies (1.5); email correspondence (1); case management (0.5)
28/07/2025	Dennis A. Meloro	0,20	Call with K. Donahue of K&E re: GT retention application in Delaware chapter 11 case.
28/07/2025	Dennis A. Meloro	0,80	Review and comment on draft of GT retention application.
28/07/2025	Lucrezia Naronte	2,00	Ricerca
28/07/2025	Riccardo Agostinelli	1,50	issues related to Art. 56
28/07/2025	Riccardo Agostinelli	1,50	issues related to the DIP financing
28/07/2025	Riccardo Agostinelli	2,50	Suppliers: potential litigation and recognition of US Stay
28/07/2025	Riccardo Agostinelli	1,00	Golden Power: preparation of filing
29/07/2025	Cristina Cupolo	13,00	Coordination and review of PoAs from different jurisdictions (7) / e-mail (5)
29/07/2025	Daniele Migliarucci	9,00	Marelli Critical Vendors workstream; negotiation of TAs; several calls (4); DIP post closing obligations workstream; documents review (3); GP notice (0.5); preparation of board meetings for Italian companies (0.5); email correspondence (0.5); case management (0.5)
29/07/2025	Dennis A. Meloro	0,50	Review draft of GT retention application (.4); email with GT Italy colleagues re: same (.1).
29/07/2025	Lucrezia Naronte	3,00	Documentazione.
29/07/2025	Riccardo Agostinelli	2,50	327 (c) filling
29/07/2025	Riccardo Agostinelli	1,50	Banking: coordination of GT team
29/07/2025	Riccardo Agostinelli	1,50	Art.56 coordination of GT team
29/07/2025	Riccardo Agostinelli	2,50	Suppliers: coordination of GT team
30/07/2025	Alessandro Pallavicini	0,50	Call GOP
30/07/2025	Cristina Cupolo	11,00	Coordination and review of PoAs (3) / e-mail (3) / drafting and review of board of directors minutes (4) / BoD meeting of Marelli Europe (1)
30/07/2025	Daniele Migliarucci	10,00	Marelli Critical Vendors workstream; negotiation of TAs; several calls (3.5); DIP post closing obligations workstream; documents review (2.5); GP notice (1); preparation of board meetings for Italian companies (1.5); email correspondence (1); case management (0.5)
30/07/2025	Dennis A. Meloro	0,80	Review revised draft of GT retention application from K&E (.2); emails with K. Donahue, GT re: same (.1).
30/07/2025	Lucrezia Naronte	1,00	Call di allineamento
30/07/2025	Riccardo Agostinelli	2,50	Banking: coordination of GT team
30/07/2025	Riccardo Agostinelli	0,50	Art.56: coordination of GT team
30/07/2025	Riccardo Agostinelli	0,50	Suppliers: coordination of GT team
30/07/2025	Riccardo Agostinelli	3,50	BoD + preparation
31/07/2025	Daniele Migliarucci	10,00	Marelli Critical Vendors workstream; negotiation of TAs; several calls (4); DIP post closing obligations workstream; documents review (3); GP notice (1); Art. 56 recovery plan workstream (1); email correspondence (0.5); case management (0.5)
31/07/2025	Riccardo Agostinelli	1,00	Art.56: follow-up on progress on DD and business plan
31/07/2025	Riccardo Agostinelli	2,00	Suppliers: potential litigation issues with NM
31/07/2025	Riccardo Agostinelli	1,50	BoD preparation
31/07/2025	Cristina Cupolo	8,00	BoD meeting of Marelli Suspension (2,5) / review of board minute (3,5)/ e-mails (2)

Total Hours: **673,60**

Exhibit B



Marelli Holdings Co. Ltd.
2-19-4 Miyahara-cho, Kita-ku,
Saitama City,
331-0812 SAITAMA
JAPAN

Proforma Invoice

File no : 236514.010100
Date : July 31, 2025

Proforma Invoice

Re: Marelli restructuring

For fees and expenses in connection with Marelli restructuring post-filing incurred in July 2025 as follows:

- o Assistance to the companies (including directors, statutory auditors and external auditors (Deloitte)) with the approval of the 2024 FS
- o Implementation of Italian-related DIP Financing post-closing obligations (including the several Italian law security documents, legal opinions and deliverables related thereto)
- o Golden Power procedure as a CP to creation of the share pledges over Italian entities and change of ownership over Marelli Group.
- o Assistance to the companies in connection with the handling of the relationship with local suppliers & vendors.
- o Implementation of a recovery plan for the Italian entities under Article 56 of the Italian Bankruptcy Law.
- o Italian public grants (support to the local management in explaining situation to Italian authorities).
- o Italian labour law issues

Fees	\$	665.841,29
Charge pursuant to Decree No. 55 of 03/10/2014	\$	99.876,19
Disbursements	\$	1.059,92
Pension Fund 4%	\$	30.671,10
Subtotal	\$	797.448,50
Duty stamp	\$	2,30
Total Current Invoice:	\$	<u>797.450,80</u>

Our VAT#: 06488500965

Exchange Rate Euro to Dollar (July 31st,2025) 1,1446

Not taxable V.A.T. according to art. 7-septies of D.P.R. 633/1972.

Not subject to withholding tax ex art. 25, comma 2, D.P.R. 600/1973

Subject to duty stamp ex art.7, DPR 633/1972

Please wire the total amount within 14 days after invoice date. IBAN: IT38W 02008 09420 000600015846 (BIC:UNCRITMM) at UNICREDIT Private Banking. Please refer to the invoice and file number.

Greenberg Traurig | Studio Legale Associato | Largo Toscanini 1 | 20122 Milan, Italy
Tel 39-02-771971 | www.gtlaw.com

Professional Services Rendered: Proforma Marelli July 31st 2025

Attorney Name	Position	Department	Date of Admission	Hourly Billing Rate in this application	Hours Billed in this application	Fees Billed in this application
Agostinelli, Riccardo	Partner	Bankruptcy & Restructuring	1992	\$1,373.52	128,60	\$176.634,67
Basilisco, Martino	Associate	EU Law	2023	\$457,84	4,50	\$2.060,28
Biscaretti di Ruffia, Bertone	Senior Associate	Litigation	2017	\$572,30	2,40	\$1.373,52
Burrafato, Giuseppe Federico	Senior Associate	Corporate	2019	\$572,30	17,50	\$10.015,25
Cupolo, Cristina	Senior Associate	Bankruptcy & Restructuring	2022	\$572,30	236,00	\$135.062,80
Faraone, Giorgia	Trainee	Corporate	NA	\$280,43	1,30	\$364,56
Gambaro, Edoardo	Partner	EU Law	2003	\$1.373,52	2,00	\$2.747,04
Meloro, Dennis A.	Partner	Bankruptcy & Restructuring	2003	\$1.373,52	2,30	\$3.159,10
Migliarucci, Daniele	Partner	Bankruptcy & Restructuring	2014	\$1.373,52	211,00	\$289.812,72
Missanelli, Pietro	Senior Associate	EU Law	2016	\$572,30	2,50	\$1.430,75
Napoli, Caterina A.	Counsel	Bankruptcy & Restructuring	2004	\$686,76	2,50	\$1.716,90
Naronte, Lucrezia	Trainee	Bankruptcy & Restructuring	NA	\$280,43	15,90	\$4.458,79
Pallavicini, Alessandro	Senior Associate	Bankruptcy & Restructuring	2019	\$572,30	29,50	\$16.882,85
Soci, Lorenzo	Associate	Bankruptcy & Restructuring	2023	\$457,84	1,50	\$686,76
Torricelli, Francesca	Partner	Corporate	2006	\$1.373,52	8,00	\$10.988,16
Pozzoli, Davide	Counsel	Litigation	2009	\$686,76	3,90	\$2.678,36
Ruvolo, Alessio G.	Partner	Bankruptcy & Restructuring	2001	\$1.373,52	4,20	\$5.768,78
Totals for Attorneys & Trainees					673,60	\$665.841,29

Expense Summary

Expense	Vendor (if any)	Unit cost (if applicable)	Amount
Third Party Telephone Charges			
Standard Copies or Prints	Greenberg Traurig	0,11446	\$ 247,00
Computer Database Research			
Color Copies or Prints			
Local Transportation			\$ 176,27
Travel Expense			
Travel Meals			
Overtime meals - attorneys			\$ 636,65
Total			\$ 1.059,92

Exchange Rate Euro to Dollar (July 31st,2025) 1,1446

**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)
)
) **Obj. Date: October 3, 2025 at 4:00 p.m.**
) **Hearing Date: TBD if objection filed**
)

NOTICE OF FEE APPLICATION

PLEASE TAKE NOTICE that Greenberg Traurig Studio Legale Associato (the “**Applicant**”) has today filed the attached *Second Monthly Fee Application of Greenberg Traurig Studio Legale Associato for Compensation and Reimbursement of Expenses as Special Counsel for the Debtors and Debtors in Possession for the Period from July 1, 2025 Through and Including July 31, 2025* (the “**Application**”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, DE 19801 (the “**Bankruptcy Court**”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Application, must be made in accordance with the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief*, entered August 5, 2025 [Docket No. 477] (the “**Interim Compensation Order**”) and must be filed with the Clerk of the Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, DE 19801, and be served upon and received by (a) the Debtors, Marelli Automotive Lighting USA LLC, 26555 Northwestern Highway, Southfield, Michigan 48033, Attn.: Marisa Iasenza (marisa.iasenza@marelli.com); (b) counsel to the Debtors, (i) Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022, Attn.: Nicholas M. Adzima

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.

(nicholas.adzima@kirkland.com), and Evan Swager (evan.swager@kirkland.com), (ii) Kirkland & Ellis LLP, 333 West Wolf Point Plaza, Chicago, Illinois 60654, Attn.: Spencer A. Winters, P.C. (spencer.winters@kirkland.com), and (iii) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, P.O. Box 8705, Wilmington, Delaware 19899 (Courier 19801), Attn.: Laura Davis Jones (ljones@pszilaw.com), Timothy P. Cairns (tcairns@pszilaw.com), and Edward A. Corma (ecorma@pszilaw.com); (c) the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn.: Jane Leamy (Jane.M.Leamy@usdoj.gov) and Timothy J. Fox, Jr. (timothy.fox@usdoj.gov); (d) counsel to the DIP Agent, Mayer Brown LLP, 1221 Avenue of the Americas, New York, New York 10020-1001, Attn.: Jason Elder (jason.elder@mayerbrown.com); (e) counsel to Mizuho Bank, Ltd., (i) in all capacities other than as the Prepetition Agent, Davis Polk & Wardwell LLP, 450 Lexington Avenue, New York, New York 10017, Attn.: Timothy Graulich (timothy.graulich@davispolk.com) and Richard J. Steinberg (richard.steinberg@davispolk.com) and (ii) in its capacity as the Prepetition Agent, Young Conaway Stargatt & Taylor, LLP, 1000 North King Street, Wilmington, Delaware 19801, Attn.: Robert S. Brady (rbrady@ycst.com) and Andrew L. Magaziner (amagaziner@ycst.com); (f) counsel to the Ad Hoc Group of Senior Lenders, (i) Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, New York 10036, Attn: Ira S. Dizengoff (idizengoff@akingump.com) and Anna Kordas (akordas@akingump.com), (ii) Akin Gump Strauss Hauer & Feld LLP, 2001 K Street NW, Washington, D.C., 20006, Attn.: Scott L. Alberino (salberino@akingump.com), Kate Doorley (kdoorley@akingump.com), and Alexander F. Antypas (aantypas@akingump.com), and (iii) Cole Schotz P.C., 500 Delaware Avenue, Suite 600, Wilmington, Delaware 19801, Attn: Justin R. Alberto (jalberto@coleschotz.com) and Stacy L. Newman (snewman@coleschotz.com); (g) counsel to the Initial Tranche A Lender, (i) Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019, Attn: Joseph Minias (jminias@willkie.com) and Christine Thain (cthain@willkie.com), (ii) Willkie Farr & Gallagher

LLP, 600 Travis Street, Houston, Texas 77002, Attn: Jennifer J. Hardy (jhardy2@willkie.com), and (iii) Bayard P.A., 600 N. King St. Suite 400, Wilmington, Delaware 19801, Attn: Ericka F. Johnson (ejohnson@bayardlaw.com) and Steven D. Adler (sadler@bayardlaw.com); (h) counsel to the Sponsors, Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019-6064, Attn.: Brian S. Hermann (bhermann@paulweiss.com) and Jacob A. Adlerstein (jadlerstein@paulweiss.com); (i) co-counsel to the Committee, (i) Paul Hastings LLP, 200 Park Avenue, New York, New York 10166, Attn.: Kristopher M. Hansen (krishansen@paulhastings.com), Jonathan D. Canfield (joncanfield@paulhastings.com), Gabriel E. Sasson (gabesasson@paulhastings.com), and Marcella Leonard (marcellaleonard@paulhastings.com), and (ii) Morris James LLP, 500 Delaware Avenue, Suite 1500, Wilmington, Delaware 19801, Attn.: Eric J. Monzo (emonzo@morrisjames.com), Jason S. Levin (jlevin@morrisjames.com), and Siena B. Cerra (scerra@morrisjames.com); and (j) special counsel to the Debtors as to Italian law matters, Greenberg Traurig Studio Legale Associato, Galleria San Babila 4B, 20122 – Milan (Italy) (registered office: Largo Toscanini, 1, 20122 – Milan (Italy)), Attn.: Riccardo Agostinelli (riccardo.agostinelli@gtlaw.com), Daniele Migliarucci (daniele.migliarucci@gtlaw.com) and Dennis A. Meloro (dennis.meloro@gtlaw.com) by no later than **4:00 p.m. (Prevailing Eastern Time) on October 3, 2025 (the “Objection Deadline”)**.

PLEASE TAKE FURTHER NOTICE that if any responses or objections to the Application are timely filed, served, and received in accordance with this notice, a hearing on the Application will be held at the convenience of the Bankruptcy Court. Only those objections made in writing and timely filed and received in accordance with the Interim Compensation Order and the procedures described herein will be considered by the Bankruptcy Court at such hearing.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Interim Compensation Order, if no objection to the Application is timely filed, served, and received by the Objection Deadline, the Debtors will be authorized to pay 80 percent of the requested fees and 100 percent of the

requested expenses and charges without further order of the Bankruptcy Court.

Dated: September 12, 2025

GREENBERG TRAURIG, LLP

/s/ Dennis A. Meloro

Dennis A. Meloro (DE Bar No. 4435)

222 Delaware Avenue, Suite 1600

Wilmington, Delaware 19801

Telephone: (302) 661-7000

Facsimile: (302) 661-7360

Email: Dennis.Meloro@gtlaw.com

Special Counsel for the Debtors and Debtors in Possession