

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)

**Obj. Deadline: December 9, 2025 at 4:00 p.m. (ET)**

**Hearing Date: To be scheduled if necessary**

**SUMMARY OF FIRST INTERIM FEE APPLICATION OF PAUL HASTINGS LLP,  
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR  
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR  
THE PERIOD FROM JUNE 26, 2025 THROUGH SEPTEMBER 30, 2025**

Name of Applicant:	Paul Hastings LLP
Authorized to provide professional services to:	Official Committee of Unsecured Creditors of Marelli Automotive Lighting USA LLC, <i>et al.</i>
Date of retention:	August 11, 2025 effective as of June 26, 2025
Period for which compensation and reimbursement is sought:	June 26, 2025 through September 30, 2025
Amount of compensation sought as actual, reasonable and necessary:	\$3,462,270.00
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$4,844.89
This is an:	___ monthly <u>X</u> interim ___ final application
Prior Interim Applications:	None.

<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 <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.



2511034251118000000000002

**SUMMARY OF FEES AND EXPENSES REQUESTED**

Monthly Application		Requested Fees and Expenses		Paid Fees and Expenses		Unpaid Fees and Expenses	
Monthly Fee Period, Application Docket No., and Date Filed	CNO Docket No. and Date Filed	Fees Requested	Expenses Requested	Fees Paid	Expenses Paid	Unpaid Fees	Unpaid Expenses
6/26/2025 – 7/31/2025 [D.I. 762] 8/27/2025	[D.I. 939] 9/18/2025	\$1,724,579.50	\$1,630.12	\$1,379,663.60	\$1,630.12	\$344,915.90	\$0.00
8/1/2025 – 8/31/2025 [D.I. 1036] 9/30/2025	[D.I. 1100] 10/22/2025	\$970,042.50	\$863.12	\$776,034.00	\$863.12	\$194,008.50	\$0.00
9/1/2025 – 9/30/2025 [D.I. 1197] 11/4/25	n/a	\$767,648.00	\$2,351.65	\$0.00	\$0.00	\$767,648.00	\$2,351.65
<b>Total</b>		\$3,462,270.00	\$4,844.89	\$2,155,697.60	\$2,493.24	\$1,306,572.40	\$2,351.65

**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)

**Obj. Deadline: December 9, 2025 at 4:00 p.m. (ET)**  
**Hearing Date: To be scheduled if necessary**

**FIRST INTERIM FEE APPLICATION OF PAUL HASTINGS LLP, COUNSEL TO THE  
OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD  
FROM JUNE 26, 2025 THROUGH SEPTEMBER 30, 2025**

Paul Hastings LLP (“Paul Hastings”), as counsel to the Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) in these chapter 11 cases (the “Chapter 11 Cases”), hereby submits this application (the “Application”), pursuant to (i) sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), (ii) Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), (iii) Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and (iv) the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 477] (the “Interim Compensation Order”),<sup>2</sup> for allowance and payment of compensation for services rendered and

---

<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 <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.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Interim Compensation Order.

reimbursement of expenses for the period from June 26, 2025 through and including September 30, 2025 (the “Application Period”), and respectfully represents as follows:

**Jurisdiction and Venue**

1. The Court has jurisdiction to consider the Application pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

2. Pursuant to Local Rule 9013-1(f), Paul Hastings consents to entry of a final judgment or order with respect to this Application if it is determined that the Court would lack Article III jurisdiction to enter such final order or judgment absent consent of the parties.

3. The statutory predicates for the relief sought herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rule 2016-1.

**Background**

4. On June 11, 2025, (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code (collectively the “Chapter 11 Cases”). The Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b).

5. The Debtors have continued in the possession of their property and have continued to operate and manage their business as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in the Chapter 11 Cases.

6. On June 25, 2025, the United States Trustee for the District of Delaware (the “United States Trustee”) filed its *Notice of Appointment* [Docket No. 184] of the seven member Committee pursuant to section 1102(a)(1) of the Bankruptcy Code, which notice was subsequently

amended to reduce the number of Committee members to four [Docket Nos. 230, 922].<sup>2</sup> On June 26, 2025, the Committee selected Paul Hastings as its proposed lead counsel. On June 26, 2025, Morris James LLP (“Morris James”) was selected as the Committee’s proposed Delaware counsel. FTI Consulting, Inc. (“FTI”) was selected as the Committee’s proposed financial advisor on June 27, 2025.

7. On July 10, 2025, the Debtors filed their *Motion of the Debtors for Entry of an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief* [Docket No.252], and on August 5, 2025, the Court entered the Interim Compensation Order.

8. On July 24, 2025, the Committee filed the *Application of the Official Committee of Unsecured Creditors for Entry of an Order, Pursuant to Sections 328, 330, and 1103 of the Bankruptcy Code, Authorizing and Approving the Retention and Employment of Paul Hastings LLP as Counsel to the Committee, Effective as of June 26, 2025* (the “Retention Application”) [Docket No 338]. On August 11, 2025, the Court entered an order approving the Retention Application, effective as of June 26, 2025 [Docket No. 577].

9. On August 27, 2025, Paul Hastings filed with the Court its first monthly fee application for the period from June 26, 2025 through July 31, 2025 [Docket No. 762].

10. On September 30, 2025, Paul Hastings filed with the Court its second monthly fee application for the period from August 1, 2025 through August 31, 2025 [Docket No. 1036].

11. On November 4, 2025, Paul Hastings filed with the Court its third monthly fee application for the period from September 1, 2025 through September 30, 2025 [Docket No. 1197].

---

<sup>2</sup> The Committee is currently comprised of Nissan North America, Inc.; Mazda North American Operations; Tesla, Inc.; and Avnet, Inc.

12. The Interim Compensation Order sets forth the procedures for interim compensation and reimbursement of expenses in the Chapter 11 Cases. Specifically, the Interim Compensation Order provides that, at three-month intervals, each of the Professionals may file with the Court and serve on the Application Recipients an interim fee application for compensation and reimbursement of expenses sought by such Professional in its monthly fee applications. The Interim Compensation Order provides that the first such interim fee application shall cover the period from the Petition Date through September 30, 2025.

### **Relief Requested**

13. Pursuant to this Application and the Interim Compensation Order, Paul Hastings seeks (a) allowance of compensation as an administrative expense claim against each of the Debtors' estates, jointly and severally, in the aggregate amount of \$3,467,114.89 for fees and expenses incurred by Paul Hastings in rendering services to the Committee during the Application Period, and (b) the Debtors' payment of the unpaid balance of such fees and expenses.

14. Pursuant to the Interim Compensation Order and section 331 of the Bankruptcy Code, Paul Hastings seeks compensation in the amount of \$3,462,270.00 in fees for professional services rendered by Paul Hastings during the Application Period. This amount is derived solely from the applicable hourly billing rates of Paul Hastings personnel who rendered services to the Committee. In addition, Paul Hastings seeks reimbursement of expenses incurred during the Application Period in the amount of \$4,844.89.

### **Summary of Services**

15. During the Application Period, Paul Hastings worked closely with the Committee and the Committee's other professionals in pursuing the Committee's objectives and maximizing value for all interested parties. The following summary highlights the major areas in which Paul Hastings rendered services to the Committee during the Application Period.

16. Case Administration (Task Code 01) (234.4 hours; \$392,791.00). This category includes services rendered in connection with the day-to-day management of the Chapter 11 Cases including, but not limited to, the assessment of general case issues and Committee action items, maintaining a case calendar of upcoming events, hearings, and deadlines, conferring with the Committee's other professionals regarding case matters, and additional general administrative matters.

17. General Motions and Pleadings / Docket Review (Task Code 02) (177.2 hours; \$246,412.00). This category includes time spent monitoring the docket of the Chapter 11 Cases and reviewing multiple pleadings and motions filed by parties to inform the strategy and path of the Committee in the Chapter 11 Cases.

18. Debtor Meetings and Communications (Task Code 03) (86.4 hours; \$141,674.00). This category includes attending meetings with the Debtors' professionals and communicating with the Debtors' professionals on case matters.

19. UCC / Creditor Meetings and Communications (Task Code 04) (136.3 hours; \$261,361.50). This category includes time spent attending, and preparing for, Committee meetings and communicating with Committee members and other creditors on case matters.

20. Court Hearings (Task Code 05) (22.5 hours; \$32,830.50). This category includes time spent preparing for and attending the hearings on "second day" motions and the Debtors' motion to lift the automatic stay.

21. Fee / Employment Applications (UCC Professionals) (Task Code 06) (79.2 hours; \$92,782.50). This category includes Paul Hastings' time spent preparing its retention application and related papers [Docket Nos. 338 and 497], preparing its monthly fee statements for services

rendered during the Application Period [Docket Nos. 762, 1036, and 1197], and assisting FTI with the preparation of its retention application.

22. Fee / Employment Applications (Debtor / Other Professionals) (Task Code 07) (155.6 hours; \$259,997.50). This category includes Paul Hastings' time spent reviewing retention applications of the Debtors' professional advisors and professionals employed in the ordinary course of business in the Chapter 11 Cases, preparing an objection to the retention application of PJT Partners LP, and negotiating the proposed order in connection therewith.

23. Financial Reports (Schedules, SoFAs, MORs, DIP Reports) (Task Code 08) (6.1 hours; \$5,512.50). This category includes Paul Hastings' time spent reviewing Schedules, SoFAs, and MORs.

24. Business Operations (Task Code 09) (199.3 hours; \$327,196.00). This category includes Paul Hastings' time spent reviewing the Debtors' business operation matters, including but not limited to, cash management system, wages, customers, vendors, and business plans.

25. Asset and Recovery Analysis (Task Code 10) (102.6 hours; \$186,502.50). This category includes Paul Hastings' time spent reviewing a recovery waterfall analysis developed in conjunction with the Committee's financial advisor and analyzing related issues.

26. Asset Sales and Dispositions / Section 363 Pleadings (Task Code 11) (20.7 hours; \$36,114.00). This category includes services provided in connection with the Debtors' sale process and the sale of de minimis assets and related procedures.

27. Prepetition Secured Debt / Capital Structure Analysis (Task Code 13) (284.9 hours; \$450,988.00). This category includes services rendered related to financing and security documents, including lien and perfection review and analysis.



28. DIP Financing / Cash Collateral Matters (Task Code 14) (324.5 hours; \$564,258.00). This category includes services rendered related to the Debtors' postpetition financing.

29. Relief from Stay / Adequate Protection Matters (Task Code 15) (16.8 hours; \$23,840.00). This category includes Paul Hastings' time spent reviewing motions for relief from automatic stay.

30. Investigations / Estate Claims and Avoidance Action Analysis (Task Code 17) (59.4 hours; \$117,192.00). This category includes time spent investigating and analyzing potential estate claims.

31. Litigation / Other Contested Matters (Task Code 18) (10.8 hours; \$15,166.50). This category includes services rendered related to preparing the information sharing motion.

32. Rule 2004 / Discovery Matters (Task Code 19) (30.3 hours; \$44,061.50). This category includes services rendered related to discovery requests and document review in connection with the objection to the retention application of PJT Partners LP.

33. Plan and Disclosure Statement (Task Code 21) (110.3 hours; \$179,551.00). This category includes time spent reviewing the Debtors' draft Chapter 11 plan of reorganization and draft disclosure statement.

34. Tax Matters (Task Code 23) (21.0 hours; \$37,925.00). This category includes time spent reviewing tax issues in connection with the Chapter 11 Cases.

35. Non-Working Travel (Task Code 27) (37.6 hours; \$35,422.00). This category includes time spent traveling to and from Delaware to represent the Committee in hearings in the Chapter 11 Cases.

**Interim Fee Application and Compliance with Applicable Guidelines**

36. This Application was prepared in accordance with (a) Local Rule 2016-1, (b) the United States Trustee *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, adopted on June 11, 2013 (the “U.S. Trustee Guidelines”),<sup>3</sup> and (c) the Interim Compensation Order. Attached hereto as **Exhibits A through E** are schedules requested by the U.S. Trustee Guidelines.

37. Paul Hastings responds to the questions set forth in Paragraph C.5. of the U.S. Trustee Guidelines as follows:

**Question:** Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees, or terms for services pertaining to this engagement that were provided during the Application Period?

**Response:** No.

**Question:** If the fees sought in this application as compared to the fees budgeted for the Application Period are higher by 10% or more, did you discuss the reasons for the variation with the client?

**Response:** Not applicable.

**Question:** Have any of the professionals included in this application varied their hourly rate based on the geographic location of the bankruptcy case?

**Response:** No.

**Question:** Does the application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.) If so, please quantify by hours and fees.

**Response:** Yes. The Application includes approximately 13.5 hours and associated fees of approximately \$15,106.50 related to reviewing or revising time records or invoices for, among other things, ensuring time entries are properly categorized by task code and protecting privileged or confidential information.

---

<sup>3</sup>The Committee and Paul Hastings reserve all rights as to the relevance and substantive legal effect of the U.S. Trustee Guidelines with respect to any application for compensation in the Chapter 11 Cases.

**Question:** Does this application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

**Response:** Yes, as set forth above.

**Question:** If the application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? (ii) Did your client agree when retaining the law firm to accept all future rates increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation consistent with ABA Formal Ethics Opinion 11-458?

**Response:** This Application does not include any rate adjustments since retention.

### **Reasonable and Necessary Services**

38. The services for which Paul Hastings seeks compensation were, at the time rendered, necessary for, beneficial to, and in the best interests of, the Committee and the Debtors' estates. The services rendered were consistently performed in a timely manner commensurate with the complexity, importance and nature of the issues involved. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Paul Hastings is fair and reasonable given (i) the complexity of these Chapter 11 Cases; (ii) the time expended; (iii) the nature and extent of the services rendered; (iv) the value of such services; and (v) the costs of comparable services other than in a case under this title.

### **Certificate of Compliance and Waiver**

39. The undersigned representative of Paul Hastings certifies that he has reviewed the requirements of Local Rule 2016-1, and that the Application substantially complies with that Local Rule. To the extent that the Application does not comply in all respects with the requirements of Local Rule 2016-1, Paul Hastings believes that such deviations are not material and respectfully requests that any such requirements be waived.

**Reservation**

40. To the extent that time or disbursements for services rendered relate to the Application Period but were not processed before the preparation of, or included in, this Application, or Paul Hastings has for any other reason not sought compensation or reimbursement of expenses herein with respect to any services rendered or expenses incurred during the Application Period, Paul Hastings reserves the right to request compensation for such services and reimbursement of such expenses in a supplemental or future application. Also, Paul Hastings does not waive, and expressly reserves, its right to respond to any objections regarding the Application and the amounts sought for Paul Hastings' services in the Chapter 11 Cases.

**Notice**

41. Paul Hastings will provide notice of this Application by electronic and first-class mail on the Notice Parties, as defined and set forth in the Interim Compensation Order. In light of the nature of the relief requested, Paul Hastings submits that no other or further notice is required.

**Conclusion**

WHEREFORE, Paul Hastings respectfully requests that the Court enter an order (i) approving the Application; (ii) allowing Paul Hastings an administrative expense claim for fees and expenses incurred in the aggregate amount of \$3,467,114.89 (including compensation for fees incurred in the amount of \$3,462,270.00 and reimbursement of actual and necessary expenses incurred in the amount of \$4,844.89) during the Application Period; (iii) authorizing the prompt payment of such sums to Paul Hastings pursuant to the Interim Compensation Order; and (iv) granting such other and further relief as the Court may deem just and proper.

*[Remainder of Page Intentionally Left Blank]*

Dated: November 18, 2025

**PAUL HASTINGS LLP**

/s/ Gabriel E. Sasson

Kristopher M. Hansen (admitted *pro hac vice*)

Jonathan D. Canfield (admitted *pro hac vice*)

Gabriel E. Sasson (admitted *pro hac vice*)

200 Park Ave

New York, New York 10166

Telephone: (212) 318-6000

Facsimile: (212) 319-4090

Email: krishansen@paulhastings.com

joncanfield@paulhastings.com

gabesasson@paulhastings.com

*Counsel to the Official Committee of Unsecured  
Creditors*

**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)

**Obj. Deadline: December 9, 2025 at 4:00 p.m. (ET)**

**Hearing Date: To be scheduled if necessary**

**NOTICE OF FIRST INTERIM FEE APPLICATION OF PAUL HASTINGS LLP,  
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS,  
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD FROM JUNE 26, 2025 THROUGH SEPTEMBER 30, 2025**

**PLEASE TAKE NOTICE** that on November 18, 2025, the Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors and debtors in possession (collectively, the “Debtors”), by and through its undersigned counsel, filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *First Interim Fee Application of Paul Hastings LLP, Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period from June 26, 2025 through September 30, 2025* (the “Application”), which seeks approval, allowance, and payment of professional services rendered to the Committee in the amount of \$3,462,270.00, together with reimbursement of expenses in the amount of \$4,844.89.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Application are required to be filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and served on the following, so as to be **received no later than 4:00 p.m. (ET) on December 9, 2025**. At the same time, you must also serve a copy of the response upon undersigned counsel to the Committee.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.**

---

<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 <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.

Dated: November 18, 2025

**MORRIS JAMES LLP**

/s/ Eric J. Monzo

Eric J. Monzo (DE Bar No. 5214)  
Jason S. Levin (DE Bar No. 6434)  
Siena B. Cerra (DE Bar No. 7290)  
3205 Avenue North Blvd., Suite 100  
Wilmington, DE 19803  
Telephone: (302) 888-6800  
Facsimile: (302) 571-1750  
E-mail: emonzo@morrisjames.com  
jlevin@morrisjames.com  
scerra@morrisjames.com

-and-

**PAUL HASTINGS LLP**

Kristopher M. Hansen (admitted *pro hac vice*)  
Jonathan D. Canfield (admitted *pro hac vice*)  
Gabriel E. Sasson (admitted *pro hac vice*)  
200 Park Avenue  
New York, NY 10166  
Telephone: (212) 318-6000  
Facsimile: (212) 319-2665  
E-mail: krishansen@paulhastings.com  
joncanfield@paulhastings.com  
gabesasson@paulhastings.com

*Counsel to the Official Committee of Unsecured  
Creditors*

**EXHIBIT A****CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES**

The blended hourly rate for Paul Hastings' timekeepers in its New York and Tokyo offices who billed to non-bankruptcy matters (collectively, the "Non-Bankruptcy Matters")<sup>1</sup> during the twelve-month period beginning on October 1, 2024 and ending on September 30, 2025 was, in the aggregate, approximately \$1,441 per hour. The blended hourly rate for Paul Hastings' timekeepers who billed to the Chapter 11 Cases during the Application Period was approximately \$1,632 per hour. A detailed comparison of these rates follows:

Category of Timekeeper	Blended Hourly Rate	
	Non-Bankruptcy Matters Blended Hourly Rate	Committee Blended Hourly Rate
Partner	\$1,927	\$2,147
Counsel	\$1,708	\$1,912
Associate	\$1,170	\$1,287
Paralegal	\$502	\$607
<b>All Timekeepers Aggregated</b>	<b>\$1,441</b>	<b>\$1,632</b>

---

<sup>1</sup> It is the nature of Paul Hastings' practice that certain non-bankruptcy engagements require the advice and counsel of professionals and paraprofessionals who work primarily within Paul Hastings' restructuring group. Accordingly, Non-Bankruptcy Matters consist of matters for which Paul Hastings' timekeepers represented a client in matters other than court-approved engagements as counsel for the debtor, the chapter 11 trustee, or an official committee under the Bankruptcy Code. Thus, the Non-Bankruptcy Matters include, in part, time billed by Paul Hastings' timekeepers who work primarily within Paul Hastings' restructuring group.



**EXHIBIT B****SUMMARY OF TIMEKEEPERS FOR APPLICATION PERIOD**

Name, Position	Year of First Admission, Department	Fees Billed in Application Period	Hours Billed in Application Period	Hourly Rate Billed		Number of Rate Increases Since Case Inception
				In this Application	In First Interim Application	
PARTNER						
Arai, Toshiyuki	1985, Corporate	\$333,270.00	144.9	\$2,300.00	\$2,300.00	0
Arai, Toshiyuki (travel, bill at ½ rate)	1985, Corporate	\$8,510.00	7.4	\$1,150.00	\$1,150.00	0
Bassett, Nicholas A.	2007, Financial Restructuring	\$51,255.00	25.5	\$2,010.00	\$2,010.00	0
Canfield, Jon	2007, Financial Restructuring	\$83,302.50	38.3	\$2,175.00	\$2,175.00	0
Hansen, Kris	1996, Financial Restructuring	\$364,392.00	144.6	\$2,520.00	\$2,520.00	0
Hansen, Kris (travel, bill at ½ rate)	1996, Financial Restructuring	\$5,040.00	4.0	\$1,260.00	\$1,260.00	0
Pecar, Marija	2011, Financial Restructuring	\$258,285.00	128.5	\$2,010.00	\$2,010.00	0
Sasson, Gabe	2010, Financial Restructuring	\$526,218.00	261.8	\$2,010.00	\$2,010.00	0
Sasson, Gabe (travel, bill at ½ rate)	2010, Financial Restructuring	\$8,040.00	8.0	\$1,005.00	\$1,005.00	0
Partner Total		\$1,638,312.50	763.0			
OF COUNSEL						
Ginsberg, Daniel	1997, Financial Restructuring	\$356,197.50	175.9	\$2,025.00	\$2,025.00	0
Ling, Jess	2013, Financial Restructuring	\$180.50	0.1	\$1,805.00	\$1,805.00	0
Nativelle, Maxime	2014, Financial Restructuring	\$5,394.00	3.1	\$1,740.00	\$1,740.00	0
Raiser, Dr. J. Melchior	2015, Corporate	\$10,469.00	5.8	\$1,805.00	\$1,805.00	0

Name, Position	Year of First Admission, Department	Fees Billed in Application Period	Hours Billed in Application Period	Hourly Rate Billed		Number of Rate Increases Since Case Inception
				In this Application	In First Interim Application	
Traxler, Katherine A.	1990, Financial Restructuring	\$33,957.50	28.9	\$1,175.00	\$1,175.00	0
Silber, Gary	2011, Tax	\$47,182.50	23.3	\$2,025.00	\$2,025.00	0
Zerah, Marc	2006, Corporate	\$1,805.00	1.0	\$1,805.00	\$1,805.00	0
<b>Of Counsel Total</b>		<b>\$455,186.00</b>	<b>238.10</b>			
<b>OTHER TIMEKEEPER</b>						
Lader, Jake	2018, Financial Restructuring	\$64,708.50	72.3	\$895.00	\$895.00	0
Sepinuck, Stephen	1987, Corporate	\$782.50	0.5	\$1,565.00	\$1,565.00	0
<b>Other Timekeeper Total</b>		<b>\$65,491.00</b>	<b>72.80</b>			
<b>ASSOCIATE</b>						
Catalano, Kristin	2021, Financial Restructuring	\$284,580.00	223.2	\$1,275.00	\$1,275.00	0
El Mouatassim Bih, Rasha	2021, Financial Restructuring	\$194,805.00	144.3	\$1,350.00	\$1,350.00	0
Fishman, Alexis	2025, Financial Restructuring	\$1,485.00	1.8	\$825.00	\$825.00	0
Geils, Christine M.	2021, Financial Restructuring	\$7,155.00	5.3	\$1,350.00	\$1,350.00	0
Hilpert, Johannes	2025, Corporate	\$5,101.50	5.7	\$895.00	\$895.00	0
Kamo, Yuko	2017, Financial Restructuring	\$294,120.00	193.5	\$1,520.00	\$1,520.00	0
Kamo, Yuko (travel, bill at ½ rate)	2017, Financial Restructuring	\$12,692.00	16.7	\$760.00	\$760.00	0
Leonard, Marcella	2025, Financial Restructuring	\$58,354.00	65.2	\$895.00	\$895.00	0
Pedrazzani, Peter	2020, Corporate	\$3,040.00	2.0	\$1,520.00	\$1,520.00	0
Rogan, Reed	2022, Financial Restructuring	\$215,325.00	159.5	\$1,350.00	\$1,350.00	0

Name, Position	Year of First Admission, Department	Fees Billed in Application Period	Hours Billed in Application Period	Hourly Rate Billed		Number of Rate Increases Since Case Inception
				In this Application	In First Interim Application	
Rubinchik, Sandra	2017, Financial Restructuring	\$56,848.00	37.4	\$1,520.00	\$1,520.00	0
Rubinchik, Sandra (travel, bill at ½ rate)	2017, Financial Restructuring	\$1,140.00	1.5	\$760.00	\$760.00	0
Young, Dominik	2023, Financial Restructuring	\$5,022.50	4.9	\$1,025.00	\$1,025.00	
Yu, Annie (Xue)	2024, Financial Restructuring	\$123,922.50	120.9	\$1,025.00	\$1,025.00	0
<b>Associate Total</b>		<b>\$1,263,590.50</b>	<b>981.9</b>			
<b>PARAPROFESSIONAL</b>						
Laskowski, Mat	Paralegal	\$32,400.00	54.0	\$600.00	\$600.00	0
Lee, Sandy	Paralegal	\$5,850.00	9.0	\$650.00	\$650.00	
Magzamen, Michael	Paralegal	\$1,440.00	2.4	\$600.00	\$600.00	0
<b>Paraprofessional Total</b>		<b>\$39,690.00</b>	<b>65.4</b>			
<b>Total:</b>		<b>\$3,462,270.00</b>	<b>2,121.2</b>			
<b>Blended Hourly Rate:</b>		<b>\$1,632</b>				

**EXHIBIT C**

**BUDGET AND STAFFING PLAN FOR APPLICATION PERIOD**

**BUDGET****Period Covered:** June 26, 2025 through September 30, 2025

<b>Task Code and Project Category</b>	<b>Estimated Hours</b>	<b>Estimated Fees<sup>1</sup></b>	<b>Billed Hours</b>	<b>Billed Fees</b>
01 General Case Administration	235	\$383,520	234.4	\$392,791.00
02 General Motions and Pleadings / Docket Review	165	\$269,280	177.2	\$246,412.00
03 Debtor Meetings and Communications	90	\$146,880	86.4	\$141,674.00
04 UCC / Creditor Meetings and Communications	150	\$244,800	136.3	\$261,361.50
05 Court Hearings	25	\$40,800	22.5	\$32,830.50
06 Fee / Employment Applications (UCC Professionals)	75	\$122,400	79.2	\$92,782.50
07 Fee / Employment Applications (Other Professionals)	155	\$252,960	155.6	\$259,997.50
08 Financial Reports (Schedules, SoFAs, MORs, DIP reports)	6	\$9,792	6.1	\$5,512.50
09 Business Operations	200	\$326,400	199.3	\$327,196.00
10 Asset and Recovery Analysis	110	\$179,520	102.6	\$186,502.50
11 Asset Sales and Dispositions / Section 363 Pleadings	25	\$40,800	20.7	\$36,114.00
12 Contracts and Leases	2	\$3,264	1.2	\$1,755.00
13 Prepetition Secured Debt / Capital Structure Analysis	280	\$456,960	284.9	\$450,988.00
14 DIP Financing / Cash Collateral Matters	340	\$554,880	324.5	\$564,258.00
15 Relief from Stay/Adequate Protection Matters	20	\$32,640	16.8	\$23,840.00
16 Claims Analysis / Objections	5	\$8,160	4.1	\$8,937.00
17 Investigations / Estate Claims and Avoidance Action Analysis	65	\$106,080	59.4	\$117,192.00
18 Litigation / Other Contested Matters	10	\$16,320	10.8	\$15,166.50
19 Rule 2004 / Discovery Matters	30	\$48,960	30.3	\$44,061.50
21 Plan and Disclosure Statement	110	\$179,520	110.3	\$179,551.00
23 Tax Matters	25	\$40,800	21.0	\$37,925.00
27 Non-Working Travel (billed at 1/2 rate)	40	\$32,640	37.6	\$35,422.00
<b>Total:</b>	<b>2,163</b>	<b>\$3,497,376</b>	<b>2,121.2</b>	<b>\$3,462,270.00</b>

<sup>1</sup> The budgeted fees are calculated based on a blended hourly rate of \$1,632 for the Paul Hastings timekeepers expected to work on this matter during the Application Period.

**STAFFING PLAN****Period Covered:** June 26, 2025 through September 30, 2025

<b>Category of Timekeeper (using categories maintained by the firm)</b>	<b>Number of Timekeepers Expected to Work on Matter During Budget Period</b>	<b>Anticipated Average Hourly Rate for Budget Period</b>
Partner	6	\$1,830
Of Counsel	7	\$1,770
Associate	12	\$1,150
Paraprofessional	3	\$620

**EXHIBIT D**

**SUMMARY OF COMPENSATION AND EXPENSE REIMBURSEMENT  
FOR APPLICATION PERIOD**

**SUMMARY OF COMPENSATION FOR APPLICATION PERIOD**

Task Code and Project Category		Hours Billed	Fees Sought
01	General Case Administration	234.4	\$392,791.00
02	General Motions and Pleadings / Docket Review	177.2	246,412.00
03	Debtor Meetings and Communications	86.4	141,674.00
04	UCC / Creditor Meetings and Communications	136.3	261,361.50
05	Court Hearings	22.5	32,830.50
06	Fee / Employment Applications (UCC Professionals)	79.2	92,782.50
07	Fee / Employment Applications (Debtor / Other Professionals)	155.6	259,997.50
08	Financial Reports (Schedules, SoFAs, MORs, DIP reports)	6.1	5,512.50
09	Business Operations	199.3	327,196.00
10	Asset and Recovery Analysis	102.6	186,502.50
11	Asset Sales and Dispositions / Section 363 Pleadings	20.7	36,114.00
12	Contracts and Leases	1.20	1,755.00
13	Prepetition Secured Debt / Capital Structure Analysis	284.9	450,988.00
14	DIP Financing / Cash Collateral Matters	324.5	564,258.00
15	Relief from Stay / Adequate Protection Matters	16.8	23,840.00
16	Claim Analysis / Objections	4.1	8,937.00
17	Investigations / Estate Claims and Avoidance Action Analysis	59.4	117,192.00
18	Litigation / Other Contested Matters	10.8	15,166.50
19	Rule 2004 / Discovery Matters	30.3	44,061.50
21	Plan and Disclosure Statement	110.3	179,551.00
23	Tax Matters	21.0	37,925.00
27	Non-Working Travel	37.6	35,422.00
<b>Total:</b>		<b>2,121.2</b>	<b>\$3,462,270.00</b>



**SUMMARY OF EXPENSE REIMBURSEMENT FOR APPLICATION PERIOD**

<b>Category</b>	<b>Amount</b>
Court Reporting Services	\$2,248.10
Electronic Document Retrieval	6.98
Lexis/On Line Search	193.88
Local - Meals	37.47
Local - Rail/Train/Bus	19.40
Local – Taxi	72.77
Reproduction Charges	6.32
Reproduction Charges – Color	221.00
Taxi/Ground Transportation	444.70
UPS/Courier Service	129.12
Westlaw	1,465.15
<b>Total:</b>	<b>\$4,844.89</b>

**EXHIBIT E****SUMMARY OF INTERIM FEE APPLICATION**

Name of Applicant	Paul Hastings LLP
Name of Client	The Official Committee of Unsecured Creditors
Time period covered by this Application	June 26, 2025 through September 30, 2025
Total compensation sought during the Application Period	\$3,462,270.00
Total expenses sought during the Application Period	\$4,844.89
Petition Date	June 11, 2025
Retention Date	June 26, 2025
Date of order approving employment	August 11, 2025 [Docket No. 577]
Total compensation approved by interim order to date	\$0.00
Total expenses approved by interim order to date	\$0.00
Total allowed compensation paid to date pursuant to interim order	\$0.00
Total allowed expenses paid to date pursuant to interim order	\$0.00
Blended rate in the Application Period for all attorneys	\$1,665
Blended rate in the Application Period for all timekeepers	\$1,632
Compensation sought for the Application Period already paid pursuant to a monthly compensation order but not yet allowed	\$2,155,697.60
Expenses sought for the Application Period already paid pursuant to a monthly compensation order but not yet allowed	\$2,493.24
Number of professionals and paraprofessionals included for the Application Period	30
If applicable, number of professionals for the Application Period not included in staffing plan approved by client	N/A
If applicable, difference between fees budgeted and compensation sought during the Application Period	Fees Budgeted: \$3,497,376.00 Actual Fees: <u>\$3,462,270.00</u> \$ 35,106.00
Number of professionals and paraprofessionals billing fewer than 15 hours to the case during the Application Period	12
Are any rates higher than those approved or disclosed at retention?	No

**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)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of November, 2025, I caused to be filed with the Court electronically, and I caused to be served a true and correct copy of the *First Interim Fee Application of Paul Hastings LLP, Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period from June 26, 2025 through September 30, 2025* upon the parties that are registered to receive notice via the Court's CM/ECF notification system, and an additional service was competed via electronic mail on the parties listed on the attached service list.

/s/ Eric J. Monzo

Eric J. Monzo (DE Bar No. 5214)

---

<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 <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.

Service List

Marisa Iasenza  
Marelli Automotive Lighting  
USA LLC, 26555 Northwestern Highway  
Southfield, Michigan 48033  
marisa.iasenza@marelli.com

*Debtors*

Nicholas M. Adzima, Esq.  
Evan Swager, Esq.  
Kirkland & Ellis LLP  
601 Lexington Avenue  
New York, New York 10022  
nicholas.adzima@kirkland.com  
evan.swager@kirkland.com

and

Spencer A. Winters, P.C  
Kirkland & Ellis LLP  
333 West Wolf Point Plaza  
Chicago, Illinois 60654  
spencer.winters@kirkland.com

and

Laura Davis Jones, Esq.  
Timothy P. Cairns, Esq.  
Edward A. Corma, Esq.  
Pachulski Stang Ziehl & Jones LLP  
919 North Market Street  
17th Floor, P.O. Box 8705  
Wilmington, Delaware 19899  
ljones@pszjlaw.com  
tcairns@pszjlaw.com  
ecorma@pszjlaw.com

*Counsel to the Debtors*

Jason Elder, Esq.  
Mayer Brown LLP  
1221 Avenue of the Americas  
New York, New York 10020-1001  
jason.elder@mayerbrown.com

*Counsel to the DIP Agent*

Jane Leamy, Esq.  
Timothy J. Fox, Jr., Esq.  
Office of the United States Trustee  
for the District of Delaware  
844 King Street, Suite 2207, Lockbox 35,  
Wilmington, Delaware 19801  
Jane.M.Leamy@usdoj.gov  
timothy.fox@usdoj.gov

*United States Trustee*

Timothy Graulich, Esq.  
Richard J. Steinberg, Esq.  
Davis Polk & Wardwell LLP  
450 Lexington Avenue  
New York, New York 10017  
timothy.graulich@davispolk.com  
richard.steinberg@davispolk.com

*Counsel to Mizuho Bank, Ltd., in all  
capacities other than as the Prepetition Agent*

Robert S. Brady, Esq.  
Andrew L. Magaziner, Esq.  
Young Conaway Stargatt & Taylor, LLP  
1000 North King Street  
Wilmington, Delaware 19801  
rbrady@ycst.com  
amagaziner@ycst.com

*Counsel to Mizuho Bank, Ltd., in its capacity  
as the Prepetition Agent*

Brian S. Hermann, Esq.  
Jacob A. Adlerstein, Esq.  
Paul, Weiss, Rifkind,  
Wharton & Garrison LLP  
1285 Avenue of the Americas  
New York, New York 10019-6064  
bhermann@paulweiss.com  
jadlerstein@paulweiss.com

*Counsel to the Sponsors*

Ira S. Dizengoff, Esq.  
Anna Kordas, Esq.  
Akin Gump Strauss Hauer & Feld LLP  
One Bryant Park  
New York, New York 10036  
idizengoff@akingump.com  
akordas@akingump.com

and

Scott L. Alberino, Esq.  
Kate Doorley, Esq.  
Alexander F. Antypas, Esq.  
Akin Gump Strauss Hauer & Feld LLP  
2001 K Street NW  
Washington, D.C., 20006  
salberino@akingump.com  
kdoorley@akingump.com  
aantypas@akingump.com

and

Justin R. Alberto, Esq.  
Stacy L. Newman, Esq.  
Cole Schotz P.C.  
500 Delaware Avenue, Suite 600  
Wilmington, Delaware 19801  
jalberto@coleschotz.com  
snewman@coleschotz.com

*Counsel to the Ad Hoc Group of Senior  
Lenders*

Joseph Minias, Esq.  
Christine Thain, Esq.  
Willkie Farr & Gallagher LLP  
787 Seventh Avenue  
New York, New York 10019  
jminias@willkie.com  
cthain@willkie.com

and

Jennifer J. Hardy, Esq.  
Willkie Farr & Gallagher LLP  
600 Travis Street  
Houston, Texas 77002  
jhardy2@willkie.com

and

Ericka F. Johnson, Esq.  
Steven D. Adler, Esq.  
Bayard P.A.  
600 N. King St. Suite 400  
Wilmington, Delaware 19801  
ejohnson@bayardlaw.com  
sadler@bayardlaw.com

*Counsel to the Initial Tranche A Lender*