

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

In re:

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

Debtors.

Chapter 11

Case No. 25-11034 (CTG)

(Jointly Administered)

Re: Docket Nos. 1221, 1222, 1223

**CERTIFICATION OF COUNSEL REGARDING OMNIBUS ORDER APPROVING
FIRST INTERIM FEE APPLICATIONS OF THE COMMITTEE PROFESSIONALS**

The undersigned counsel to the Official Committee of Unsecured Creditors appointed in the above-referenced bankruptcy cases (the “Committee”), hereby certifies as follows:

1. On November 18, 2025, the Committee filed the following interim fee applications (each an “Interim Application”, and collectively, the “Interim Applications”) for the Committee’s professionals (the “Professionals”) in the above-captioned bankruptcy case of Marelli Automotive Lighting USA LLC and its affiliated debtors (the “Debtors”) with the United States Bankruptcy Court for the District of Delaware (the “Court”):

- i. 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 [Docket No. 1221];
- ii. First Interim Application of Morris James LLP, Co-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 [Docket No. 1222]; and
- iii. First Interim Fee Application of FTI Consulting, Inc., Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses for the Period from June 27, 2025 through September 30, 2025 [Docket No. 1223].

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://www.veritaglobal.net/Marelli>. The location of Marelli Automotive Lighting USA LLC’s principal place of business and the Debtors’ service address in these chapter 11 cases is 26555 Northwestern Highway, Southfield, Michigan 48033.



2. Responses or objections to the Interim Applications were to be filed and served no later than December 9, 2025 at 4:00 p.m. (ET) (the “Objection Deadline”). The Professionals received no filed objections to the Interim Applications prior to the Objection Deadline, although Paul Hastings LLP (“Paul Hastings”) received informal comments from the Office of the United States Trustee (the “U.S. Trustee”) that have been resolved pursuant to certain agreed reductions as set forth in the Proposed Order (as defined below).

3. Given Paul Hastings’ agreement with the U.S. Trustee and the lack of any filed objections to the approval of the Interim Applications, counsel to the Committee prepared a proposed form of omnibus order (the “Proposed Order”) approving the Interim Applications. A copy of the Proposed Order is attached hereto as **Exhibit 1**.

[Remainder of Page Intentionally Left Blank]

WHEREFORE, the Professionals respectfully request that the Proposed Order be entered at the earliest convenience of the Court.

Dated: December 12, 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 1

Interim Fee Order

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

In re:

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

Debtors.

Chapter 11

Case No. 25-11034 (CTG)

(Jointly Administered)

Re: Docket Nos. 1221, 1222, 1223

**OMNIBUS ORDER APPROVING FIRST INTERIM FEE APPLICATIONS
OF THE COMMITTEE PROFESSIONALS**

Upon consideration of the interim applications (each an “Interim Application” and, collectively, the “Interim Applications”) of those professionals (each a “Professional” and, collectively, the “Professionals”) listed on **Exhibit A** attached hereto in the bankruptcy cases of Marelli Automotive Lighting USA LLC and its affiliated debtors in the above-captioned proceeding (the “Debtors”) for allowance of compensation and reimbursement of expenses for the periods set forth on such exhibit; and it appearing to the Court that all of the requirements of sections 327, 328, 331 and 503(b) of title 11 of the United States Code, as well as Rule 2016 of the Federal Rules of Bankruptcy Procedure and Rule 2016-1 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware, have been satisfied; and it further appearing that the compensation and expenses incurred were reasonable and necessary; and that notices of the Interim Applications were appropriate; and after due deliberation and sufficient good cause appearing therefore; it is hereby:

ORDERED, that the interim Applications are hereby APPROVED in the amount set forth on **Exhibit A** attached hereto; and it is further

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://www.veritaglobal.net/Marelli>. The location of Marelli Automotive Lighting USA LLC’s principal place of business and the Debtors’ service address in these chapter 11 cases is 26555 Northwestern Highway, Southfield, Michigan 48033.

ORDERED, that the Professionals are granted interim allowance of compensation in the amount set forth on **Exhibit A** attached hereto; and it is further

ORDERED, that the Professionals are granted interim reimbursement of expenses in the amount set forth on **Exhibit A** attached hereto; and it is further

ORDERED, that the Debtors are authorized and directed, as provided herein, to remit, or caused to be remitted, payment in the amount set forth on **Exhibit A** attached hereto, less any and all amounts previously paid on account of such fees and expenses; and it is further

ORDERED, that the Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

EXHIBIT A**In re: Marelli Automotive Lighting USA LLC, et al.****Case No. 25-11034 (CTG)****Interim Fee Period - June 26, 2025 through September 30, 2025**

| Name of Professional | Firm's Role in Case | Compensation Requested (Interim Period) | Expenses Requested (Interim Period) | Voluntary Fee Reductions (Interim Period) | Voluntary Expense Reductions (Interim Period) | Interim Fees Approved | Interim Expenses Approved |
|-----------------------------|--|--|--|--|--|------------------------------|----------------------------------|
| Paul Hastings LLP | Counsel to the Official Committee of Unsecured Creditors | \$3,462,270.00 | \$4,844.89 | \$3,308.00 | \$0.00 | \$3,458,962.00 | \$4,844.89 |
| Morris James LLP | Co-Counsel to the Official Committee of Unsecured Creditors | \$217,234.00 | \$3,154.61 | \$0.00 | \$0.00 | \$217,234.00 | \$3,154.61 |
| FTI Consulting, Inc. | Financial Advisor to the Official Committee of Unsecured Creditors | \$3,905,323.80 | \$44,072.07 | \$0.00 | \$0.00 | \$3,905,323.80 | \$44,072.07 |