

Accordingly, it is hereby respectfully requested that the proposed order attached hereto as **Exhibit A** be entered at the Court's convenience.

Dated: May 4, 2026
Wilmington, Delaware

/s/ Laura Davis Jones

PACHULSKI STANG ZIEHL & JONES LLP

Laura Davis Jones (DE Bar No. 2436)
Timothy P. Cairns (DE Bar No. 4228)
Edward A. Corma (DE Bar No. 6718)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
tcairns@pszjlaw.com
ecorma@pszjlaw.com

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

Joshua A. Sussberg, P.C. (admitted *pro hac vice*)
Nicholas M. Adzima (admitted *pro hac vice*)
Evan Swager (admitted *pro hac vice*)
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
Email: joshua.sussberg@kirkland.com
nicholas.adzima@kirkland.com
evan.swager@kirkland.com

-and-

Ross M. Kwasteniet, P.C. (admitted *pro hac vice*)
Spencer A. Winters, P.C. (admitted *pro hac vice*)
333 West Wolf Point Plaza
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: ross.kwasteniet@kirkland.com
spencer.winters@kirkland.com

*Co-Counsel for the Debtors
and Debtors in Possession*

*Co-Counsel for the Debtors
and Debtors in Possession*

Exhibit A

Proposed Order

**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)
)	Re: Docket No. 1673

**ORDER GRANTING SECOND INTERIM 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 OCTOBER 1, 2025 THROUGH AND INCLUDING DECEMBER 31, 2025**

Upon consideration of the *Second Interim 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 October 1, 2025 Through and Including December 31, 2025* (the “Application”) [Docket No. 1673] (the “Interim Fee Application”) filed by Greenberg Traurig Studio Legale Associato (“Greenberg Traurig”) as special counsel to the above-captioned debtors and debtors in possession (the “Debtors”) in the above-captioned chapter 11 cases; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Interim Fee Application in this district is proper pursuant to

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.

28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Interim Fee Application is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having found that notice of the Interim Fee Application and opportunity for a hearing thereon were appropriate and no other notice need be provided; and this Court having reviewed the Interim Fee Application and having determined that the legal and factual bases set forth therein establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Interim Fee Application is GRANTED.
2. Greenberg Traurig's fees of \$1,299,302.78 and \$2,590.43 plus \$255,436.20 in pass-through charges as reimbursement of expenses for the period of October 1, 2025 through December 31, 2025 are allowed on an interim basis.
3. The Debtors are authorized to disburse to Greenberg Traurig any unpaid portion of such allowed fees and expenses.
4. Greenberg Traurig is hereby granted an administrative expense claim for all allowed amounts set forth herein and in the Application.
5. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.