

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

United States Courts
Southern District of Texas
FILED

APR 25 2025

In re:

AUTO PLUS AUTO SALES LLC,

Wind-Down Debtor.¹

Chapter 11

Nathan Ochsner, Clerk of Court

Case No. 23-90055 (CML)

(Formerly Jointly Administered
under Lead Case IEH Auto Parts
Holding LLC, Case No. 23-90054)

**GUC TRUSTEE'S THIRTEENTH OMNIBUS OBJECTION TO CLAIMS
(Reduced Claims)**

OBJECTION TO DEBTOR'S OMNIBUS OBJECTION TO CLAIMS

Autologue Computer Systems, Inc., a creditor in the above-captioned case, by and through its undersigned counsel, hereby objects to the Debtor's Omnibus Objection to Claims filed on [Filing Date of Objection]. Autologue Computer Systems, Inc. respectfully submits this Objection for the following reasons:

I. INTRODUCTION

1. Autologue Computer Systems, Inc. is a creditor of the Debtor, Auto Plus Auto Sales LLC, holding a claim arising from services rendered.
2. The Debtor has filed an Omnibus Objection to Claims that improperly seeks to disallow Autologue Computer Systems, Inc.'s claim, which is justly and properly documented and substantiated.

II. BACKGROUND

1. In January and February of 2023, Autologue Computer Systems, Inc. provided services to the Debtor.
2. The claim of Autologue Computer Systems, Inc., in the amount of \$112,714.32, arises from services rendered.
3. Despite repeated requests for payment, the Debtor has failed to satisfy the outstanding balance.

III. LEGAL ARGUMENTS



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1. **Validity of the Claim:** The claim of Autologue Computer Systems, Inc. is valid and arises from legitimate business transactions for which the Debtor has received and accepted goods/services.
2. **Improper Grounds for Objection:** The Debtor's grounds for objection as stated in their Omnibus Objection are insufficient because proofs of claim is valid and arises from legitimate business transactions.
3. **Rights Under the Bankruptcy Code:** As a creditor, Autologue Computer Systems, Inc. is entitled to file its claim and have it allowed unless valid legal grounds are demonstrated for disallowance, which have not been in this case.

IV. RELIEF REQUESTED

Autologue Computer Systems, Inc. respectfully requests that the Court:

1. Deny the Debtor's Omnibus Objection to the Claim of Autologue Computer Systems, Inc..
2. Allow the claim of Autologue Computer Systems, Inc. in its entirety.
3. Grant such other and further relief as the Court deems just and proper.

CONCLUSION

For the reasons set forth above, Autologue Computer Systems, Inc. respectfully requests that this Court deny the Debtor's Omnibus Objection to Claims and allow Autologue Computer Systems, Inc.'s claim in full.

Respectfully submitted,

Donny Krause

CFO

Autologue Computer Systems, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2025, I served a copy of this Objection by FedEx to the following:

1) Debtors' counsel:

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