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United States Courts  
Southern District of Texas  
FILED

FEB 23 2026

Nathan Ochsner, Clerk of Court

2/15/2026

United States Bankruptcy Court  
Southern District of Texas  
Houston Division  
515 Rusk Avenue  
Houston, TX 77002

RE: Public Records Request - Case No. 23-90054 (In re: Pep Boys - Manny, Moe & Jack of Delaware, Inc., et al.)

Dear Clerk of Court:

I am writing to request copies of specific documents from the above-referenced bankruptcy case pursuant to my right to access public court records.

**CASE INFORMATION:**

Case Number: 23-90054

Case Name: In re: Pep Boys - Manny, Moe & Jack of Delaware, Inc., et al.

Court: United States Bankruptcy Court, Southern District of Texas, Houston Division

Debtors: Including Pep Boys - Puerto Rico, Inc. and related Icahn Enterprises entities

**REQUESTED DOCUMENTS:**

**1. REAL PROPERTY TRANSACTIONS**

All motions, orders, and supporting documentation related to the sale, transfer, or disposition of real property, specifically:

- a. Any Motion to Sell Real Property regarding 29 Elizabeth Drive, Chester, NY 10918
- b. Any Motion to Sell Real Property regarding former Pep Boys distribution centers or facilities
- c. Sale approval orders and asset purchase agreements
- d. Appraisals, valuations, or broker opinions of value for the Chester, NY property
- e. Section 363 sale motions and orders related to IEP Chester LLC assets

**2. PUERTO RICO SUBSIDIARY TRANSACTIONS**

All documents related to Pep Boys - Puerto Rico, Inc., including:

- a. Schedules of assets and liabilities
- b. Statement of financial affairs
- c. Monthly operating reports showing cash receipts and disbursements
- d. Any inter-company transfers or transactions between Pep Boys - Puerto Rico, Inc. and other debtors
- e. Any payments or transfers to or from SK2 LLC



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### 3. ICAHN ENTERPRISES INVOLVEMENT

All documents related to parent company Icahn Enterprises L.P. or subsidiary IEP Chester LLC, including:

- a. Corporate ownership charts or organizational structure diagrams
- b. Guarantees, indemnifications, or affiliate agreements
- c. Cash management system descriptions
- d. Intercompany claims or settlements
- e. Any correspondence regarding the use of sale proceeds

### 4. CREDITOR CLAIMS AND DEBT STRUCTURE

- a. Proofs of claim filed by Goldman Sachs, UBS, and BNP Paribas
- b. Schedules identifying holders of senior secured notes
- c. Documents related to the redemption or satisfaction of senior debt
- d. Any adversary proceedings involving secured creditors
- e. Final distribution reports or payment waterfall analyses

### 5. ASSET LIQUIDATION TIMELINE

- a. Asset sale procedures and bidding protocols
- b. Marketing materials or offering memoranda for real property sales
- c. Auction results or competing bid information
- d. Break-up fees or expense reimbursement agreements
- e. Any objections filed regarding asset sales

### 6. GOVERNMENTAL INVOLVEMENT

- a. Any notices, correspondence, or filings mentioning:
  - Department of Homeland Security (DHS)
  - Immigration and Customs Enforcement (ICE)
  - SK2 LLC
  - Any federal government entities as potential purchasers
- b. Any motions or orders regarding regulatory approvals
- c. Environmental review documents or NEPA compliance filings

### 7. FINANCIAL REPORTING (January 2026)

- a. Monthly operating reports for January 2026
- b. Cash receipts and disbursement reports showing the \$5,980,800 transaction
- c. Bank account statements or cash management reports
- d. Any reports filed with the U.S. Trustee's office in January 2026

### 8. RECENT FILINGS (January 27, 2026 - Present)

All docket entries and documents filed on or after January 27, 2026, particularly:

- a. Any filings contemporaneous with Icahn Enterprises SEC Form 8-K filing
- b. Notices of fund transfers or distributions

c. Status reports or updates to the court

#### ACCESS METHOD PREFERENCE:

I understand that bankruptcy court records are public and available through PACER. However, I am requesting paper or PDF copies of these specific documents for the following reasons:

- The volume of documents in this case makes targeted document retrieval more cost-effective
- I request a complete set of documents to ensure nothing is missed
- Some documents may be filed under seal or require special access

If you prefer that I access these documents through PACER, please provide:

- The specific docket entry numbers for the requested categories
- Instructions for accessing any sealed or restricted documents
- Confirmation that all requested documents are available electronically

#### FEE INFORMATION:

Please inform me of applicable copying fees before processing this request. If fees will exceed \$50, please contact me for approval.

I am willing to pay reasonable copying costs but request a fee waiver or reduction if available, as this information concerns matters of substantial public interest regarding:

- The use of bankruptcy proceedings to facilitate federal government real property acquisitions
- Potential coordination between private corporate interests and government agencies
- The transparency of asset sales involving public funds

#### ALTERNATIVE: PACER ACCESS GUIDANCE

If you determine that PACER access is more appropriate, please provide:

1. Confirmation that all requested documents are available electronically
2. A list of relevant docket entry numbers organized by the categories above
3. Instructions for any documents requiring special access or permissions
4. Estimated PACER fees for retrieving the requested documents

#### URGENCY:

This request relates to ongoing matters of public concern. I respectfully request expedited processing if possible.

#### CONTACT INFORMATION:

Please contact me at (510) 575-9973 or [lucas@gonze.com](mailto:lucas@gonze.com) if you have questions or need clarification. I am available to discuss the most efficient method for obtaining these records.

Thank you for your assistance.

Sincerely,

Lucas Gonze



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SUBMISSION TRACKING

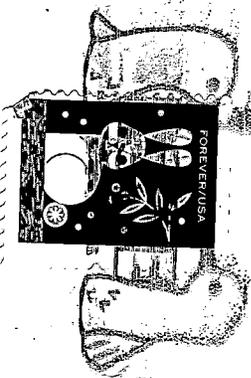
Date Sent:

2/15/26

Method:  Mail  In Person  Email (if available)

Confirmation/Tracking #: \_\_\_\_\_

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Cold Springs NY 10516  
WESTCHESTER NY 105  
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United States Bankruptcy Court  
Southern District of Texas  
Houston Division  
515 Rust Avenue  
Houston TX 77002

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77002-262355  
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